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September 27, 2001

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Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attention: Patrick Forster, Senior Engineer (3-A104)
Policy Division
Wireless Telecommunications Bureau

Re: Choice Wireless, LC
TRS #819899
Implementation Plans of Wireless E911 Phase II Automatic
Location Identification
CC Docket No. 94-102 /

REVISION TO E911 PHASE II IMPLEMENTATION REPORT

Dear Ms. Salas:

Choice Wireless, LC ("Choice"), by its attorneys and pursuant to Section 20.18(i) of the Commission's Rules,¹ hereby reports the revision of the E911 Phase II Implementation Report filed on November 9, 2000, and supplemented on December 22, 2000 and January 18, 2001, to specify that Choice will utilize a network-based ALI technology.

I. Background

Choice has chosen to implement GSM technology in its network and began offering wireless service on a commercial basis in November 2000. To date, Choice has not received a Phase II request from a PSAP that is capable of receiving and utilizing the data elements and that has a mechanism in place for recovering the PSAP's costs.

Choice filed its E911 Phase II Implementation Report on November 9, 2000 in accordance with Section 20.18(i) of the Commission's Rules. In this initial report, Choice stated that it was inclined to select a handset-based ALI solution for its PCS network. A month later, in response to a written request by the Wireless Telecommunications Bureau, Choice supplemented the report to state that it had chosen a handset-based ALI technology but reported that it had not yet located a vendor that has a product available for GSM phones.

¹ 47 C.F.R. §20.18(i).

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II. E911 Phase II Implementation Plans

Choice has made a diligent search to identify a network-based, handset-based or hybrid E911 Phase II solution that meets the FCC's requirements and has determined that for its GSM network, a network-based solution utilizing Cellpoint's Location Services is the only viable solution.

As demonstrated by Attachment 1, CellPoint has developed a network-based solution that is currently available and does not require modified handsets.² Further, as demonstrated by a letter filed with the FCC on September 18, 2001 (Attachment 2), CellPoint's solution utilizes a Mobile Location System ("MLS") that supports location of any mobile phone while in both active and idle mode. Choice has contacted a CellPoint sales representative and is in the process of obtaining a quote for implementation of the Location Services product in the event it receives a PSAP request.

In seeking to identify a solution, Choice has examined the Enhanced Observed Time Difference ("E-OTD") technology that many other GSM providers have chosen and has received quotes from service bureaus TCS and TSI that require deployment of this technology.³ E-OTD is a hybrid solution that determines location position through the combined use of handset-based and network-based technology. However, neither the network or handset components of this technology will be available by October 1, 2001.⁴ Accordingly, Choice has decided not to utilize the E-OTD technology in its network, but rather, to deploy CellPoint's network-based solution.

Respectfully submitted,



Tamber Ray
John Kuykendall
Counsel For
CHOICE WIRELESS, LC

cc: Qualex International (diskette)

² See Attachment 1 (noting that CellPoint's solution is commercially proven in GSM networks and works with all GSM phones).

³ These quotes are subject to nondisclosure agreements and thus are not provided.

⁴ Choice's PCS vendor, Airtel, plans to have the network component available during the first half of 2002. Choice has been unable to identify any handset vendors that currently manufacture E-OTD compatible handsets.

DECLARATION OF ALVIN M. FUHRMAN

I, Alvin M. Fuhrman, President of Choice, LC, do hereby declare under penalty of perjury that I have read the foregoing Revision to E911 Phase II Implementation Report and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.



Alvin M. Fuhrman

Dated: September 27, 2001

- ▶ [CellPoint Location Services](#)
- ▶ [CellPoint MLS](#)
- ▶ [CellPoint ExPos](#)
- ▶ [CellPoint iMate](#)
- ▶ [CellPoint Finder!](#)
- ▶ [CellPoint Resource Manager](#)
- ▶ [The Personal Security Service](#)
- ▶ [Vehicle Tracking](#)
- ▶ [Future Products and Services](#)
- ▶ [Demo Services](#)
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CELLPOINT™ LOCATION SERVICES

 [CellPoint Location Services](#)  [In Swedish](#)

CellPoint's innovative Location Services portfolio works with standard GSM and WAP-enabled phones in all GSM networks worldwide, regardless of network vendor and without any costly network upgrades.

The services are targeted towards GSM Operators and Service Providers, supporting their strategy to take the lead in boosting the Location Market by providing the most innovative and user-friendly solutions on the market.

CellPoint provides both business services, such as the Resource Manager, as well as mass-market services such as Finder! and iMate.

RESOURCE MANAGER™



Manage your service personnel, vehicles and Find your friends (and yourself!) assets more efficiently.

FINDER!™



SECURITY



INFORMATION SERVICES





Enhanced Personal Security Applications

Where is nearest...? And how do I get there?

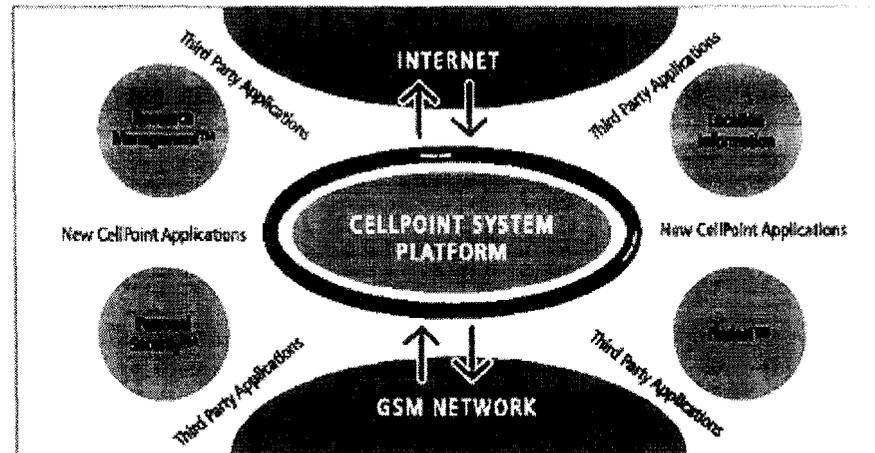
Key Advantages with CellPoint Location Services

- Commercially proven in GSM networks.
- Designed to work with the CellPoint Mobile Location System and other location systems.
- Designed for mobility, location and user-friendliness.
- Designed to support customization and system integration with the service provider's network.
- Includes full support for customer care, operations, maintenance and charging.
- Supports unlimited scalability as well as telecom grade characteristics.

CellPoint Mobile Location System

CellPoint's 3rd Generation location platform – the CellPoint Mobile Location System – supports both handset-based (SIM Toolkit, WAP and GPS) as well as network-based location. In contrast to other network-based solutions on the market, CellPoint's network location technology solution utilizes standard GSM functionality that is already supported by all major GSM infrastructure suppliers today. Furthermore, the CellPoint platform supports inter-network roaming and has a strong roadmap including future solutions such as E-OTD and A-GPS.

The CellPoint Mobile Location System provides open interfaces aligned with UMTS standards, which makes the CellPoint solution the right choice for both GSM Operators and application developers for future-proof delivery of location services.



Key Benifits

- 100% based on GSM/UMTS standards.
- Works with all GSM phones.
- Supports both terminal and application/network initiated location.
- Open interfaces for both application developers and future location technologies.
- Fast implementation in all GSM networks (including multi-vendor networks).
- Cost-efficient and data-centric architecture supporting roaming.
- End-user controlled privacy function.
- Telecom grade characteristics and unlimited scalability supporting the entire subscriber base.
- Available on both Sun Solaris and Microsoft NT/Windows 2000.

Please contact our Sales Department to discuss how your business could benefit from our location technology and location-based value-added services.

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This comment on the pending "Phase II" enhanced 911 (E911) services proceeding is submitted by CellPoint Inc., a global provider of mobile location technology and services for GSM cellular networks. CellPoint has been closely following the events leading up to the October 1, 2001 deadline for the Phase II E911 implementation mandate. The waiver applications filed focus on the alleged unavailability of network components, handsets and software. For GSM carriers, this is not correct; CellPoint has the location technology and platform available today that would enable immediate roll-out of E911 solutions, nation-wide and for every mobile phone in a GSM network, and without modified handsets or new network components. Most importantly, user-controlled privacy has been paramount in the design and development of CellPoint's location solutions.

It cannot be doubted that E911 implementation is an important public policy goal. Last week, Telecommunications Reports (Volume 67, No. 36, p. 13) reported that sixteen members of the U.S. House of Representatives have urged the Commission to hold firm to the October 1, 2001 deadline for beginning deployment of Phase II E911 services. As the lawmakers noted, E911 deployment rules were adopted in 1996 and that the requests for waivers filed by several carriers are excuses for delay when more than adequate notice of the rules' implementation has been given.

CellPoint believes that the argument that there is currently no available technology to implement Phase II in GSM networks is incorrect. CellPoint has a network-wide mobile location solution installed in Germany with mobile operator E-Plus, several commercial location systems installed in other GSM networks and is working with many other mobile operators to deploy network-wide location platforms. This is a cost-effective solution for any GSM operator, anywhere in the world. CellPoint's Mobile Location System (MLS) provides operators with a solution that utilizes CellPoint's Enhanced Cell-ID positioning technology in the immediate term, and when combined with Assisted GPS positioning technology from companies such as SiRF Technology, Inc., which is currently being integrated into MLS, GSM carriers have the technology and the roadmap to meet the Phase II Mandate through seamless migration to hybrid E-Cell-ID and Assisted GPS.

The MLS System itself supports location of any mobile phone while in both active and idle mode, and is 100% compatible with GSM and UMTS standards. Under these circumstances, there is no reason to delay Phase II implementation in the face of the compelling public policy concerns underlying E911 and the five years' delay that has already ensued. Common sense must prevail.

Although it is understandable that carriers may want to wait for other options that are not yet viable today, this is no excuse to delay implementation of a perfectly sound, secure and robust carrier-grade solution today. CellPoint's MLS has an open interface to implement possible future positioning technologies to work in parallel with E-Cell-ID and A-GPS. This reticence to deploy an E-Cell-ID platform such as CellPoint's MLS cannot be a cost concern; CellPoint's Mobile Location System is not a costly overlay solution, runs on standard, cost-effective hardware from Sun Microsystems and does not require a huge investment in customized or high-end computers. Additionally, it can be installed, tested and put into live commercial operation within a matter of weeks.

A vitally important area of concern for subscribers and carriers alike is

that of user privacy and network security. From its inception, MLS has been built with user-controlled privacy integral to the location system. Now, through CellPoint's Mobile Location Broker (MLB), data residing within carrier's trusted domain is thoroughly protected from any third-party location applications and services. This powerful combination of privacy and security functionality ensures that carriers can be assured in the knowledge that their data assets are protected. At the same time, subscribers need not worry about any 'Big Brother' implications of using next-generation location-based services -the user most definitely owns his or her location.

CellPoint's solution is software-based and network-based. In short, operators can be up and running with an E911 solution certain not to become obsolete and that is scalable, at a reasonable cost, within weeks and without having to upgrade or change their network infrastructure, now or in the future. These are compelling arguments to examine CellPoint's proven location solution - fast implementation, cost-effective, network-based, proven technology.

Meeting the requirements of the Phase II Mandate is not difficult or impossible in the short term. CellPoint and its partners have a workable solution today for GSM operators to meet the Commission's objectives. In view of the lengthy delay already occasioned and the important public policy objectives behind the E911 Mandate, we urge that the October 1, 2001 implementation deadline remain in place.

Sincerely,

CellPoint Inc.

/s
Peter Henricsson
Chairman and CEO

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