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**Florida 911 Database Group
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Sharon Camp ENP Chair

OCT 19 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC Docket 94-1021

Mr. Tom Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Certified Mail Number # Z 308-244-367

Dear Mr. Sugrue:

The Florida 9-1-1 Database Group is a group of Database Managers and 9-1-1 Coordinators dedicated to ensuring the accuracy and integrity of the 9-1-1 systems both Wireless and Landline throughout the State of Florida. As Chairman of the Florida 9-1-1 Database Group I have been asked to notify the Federal Communications Commission of the concerns this group has regarding the Wireless Carriers implementation of Phase 1 and the 9-1-1 call routing practices that are occurring here in the State of Florida.

We recognize that the implementation of wireless 9-1-1 is not a simple task, however many of our Counties are experiencing major problems with several (not all) of the Wireless Companies that are trying to implement service throughout the State of Florida. Our concern is that any one of these problems could and has endangered the lives of the wireless customers as well as the citizens and emergency service personnel of our respective Counties.

County 9-1-1 Coordinators and their staff have tried, in good faith, to work with these Wireless Companies to implement Phase 1 in our respective jurisdictions. In the majority of these instances we have found that these Wireless Companies will not work or cooperate with Counties to correct errors that have been identified. They will not cooperate to resolve issues regarding information each County needs to identify and locate towers within their jurisdiction. These Companies will not return phone calls or provide information pertinent to the routing of wireless 9-1-1 calls.

These Companies are turning up tower sites throughout the State without the contractually required drive thru call testing procedures that are necessary to make sure the wireless call is routed to the proper agency. Many of these Companies are making determinations and directing these 9-1-1 calls to whatever agency they think should respond to the area utilizing 10 digit numbers or the numbers of a PSAP's actual 9-1-1 trunk lines.

Phase 1 is supposed to provide enhanced information including the location of the towers and a call back number. In many instances this is not happening, wireless calls are coming into a Public Safety Answering Point as "No Record Found". The root of this problem is the Wireless Carriers complete disregard of procedures that each County has in place to facilitate implementation of Phase 1. These Wireless Companies are indiscriminately making routing decisions that are causing misroute situations throughout the State of Florida.

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Many of our Counties are having wireless 9-1-1 calls routed to their Public Safety Answering Points from areas that are not only Counties away but in some instances States away. One County in particular has had calls routed to Public Safety Answering Points that have displayed an area code for a province in Canada.

Several of the companies display the call back numbers in different locations on the 9-1-1-display screen. There is no uniformity to the way this critical information is displayed to PSAP's. This causes confusion as to where the actual call back number is located and which number is a call back number.

In some instances, without authorization Wireless Companies or their third party vendors have routed wireless 9-1-1 calls directly to the 9-1-1 trunks of the Public Safety Answering Points causing these calls to display Anonymous calls. They are also routing all wireless 9-1-1 calls to the Administrative lines located at many of the Public Safety Answering Points, again without authorization. Wireless calls directed to these lines provide no call back information. In many instances these administrative lines are not set up to handle emergency calls.

The 7X24 hour network management numbers in most instances are not manned for the 24-hour periods; they are only manned during daily business hours. In the evenings, when most incidents occur that require an emergency look up, call takers are directed by voice messages to call a pager number. Public Safety Answering Points do not receive a call back from these pagers until far after the fact. In emergency situations this could cost a life. Some of these Wireless Companies have even asked the local telephone service providers to add several Counties (as many as four) on one trunk group, for routing 9-1-1 calls. This action would cause an overload of calls on these trunks causing 9-1-1 calls to misroute or calls to busy out due to traffic overloads.

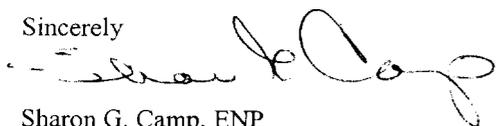
Many of the Wireless Companies have required written contracts and agreements with Counties in the State of Florida. However, these Companies have made it clear that in their opinion, per the FCC Rule and Order, they do not have to provide information or work with the Counties to resolve these serious issues. We hope that the Federal Communications Commissions understands that any one of the issues that we are experiencing here in Florida could cause a serious incident with regard to emergency response. The Florida 9-1-1 Database Group has determined that these actions are a flagrant disregard for the safety of these wireless carriers customers as well as the citizens in each county where an incident has occurred.

Processing and responding to Wireless 9-1-1 calls is a challenge even when things are working properly. We are sure you comprehend our concern for the health safety and welfare of our citizens as well as those citizens that pass through our Counties and the State of Florida daily.

We are asking the Federal Communication Commission to intercede, not only on the behalf of the 9-1-1 Community, but on the behalf of the customers of these Wireless Carriers, that are reliant on the 9-1-1 system being able to provide assistance in a timely manner. We feel that all wireless carriers should have the same type of requirements and regulations regarding 9-1-1 issues, as are in place for the landline providers.

If you would contact The Florida 9-1-1 Database Group, Chairman at 321-690-6871 or Email Sharon.Camp@countygovt.brevard.fl.us, we will be happy to provide documentation of the instances that we have alluded to in this correspondence along with the names of the those Wireless Carriers that are involved.

Sincerely



Sharon G. Camp, ENP
Chairman, Florida 9-1-1 Database Group