

February 6, 2002

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: Notice of Ex Parte Presentation Revision of the Commission's Rules to Ensure Compatibility with Enhanced 9-1-1 Emergency Calling Systems, CC Docket 94-102

Dear Ms. Salas:

On February 1, 2002 I met with Kris Monteith, Chief of the Policy Division and members of the Wireless Bureau, with Bryan Tramont, Legal Advisor to Commissioner Abernathy. Representing the City of Richardson, Texas, the purpose of each of these meetings was to discuss and address issues raised during the comment period related to recent Petition for Reconsiderations submitted by Cingular Wireless and Sprint PCS on the recent Commission action on the petition previously submitted by the City of Richardson that addressed the issue of valid PSAP requests for Phase II services from wireless carriers. The City of Richardson expressed specific concern over comments placed in the record by Cingular Wireless and VoiceStream Wireless that implied that the City of Richardson was the cause of delays in the implementation of Phase I services. Given the fact that one carrier (Sprint PCS) has been providing Phase I service to the City of Richardson for the past 12 months, the record should reflect that the City has been both willing and able to meet its burden in the wireless E9-1-1 implementation process.

Additionally, the City has placed into the record a letter from VoiceStream Wireless dated November 2, 2000 that clearly states that the reason for delays in implementation of Phase I service to the City of Richardson was because "we have been able to make progress on the Service Agreement." Per discussions with both the Wireless Bureau and Commissioner Abernathy's office, the Commission rules governing implementation of Phase I and Phase II services are in no way tied to an arbitrary mandate for a service agreement on the part of the carrier. Similarly, Cingular Wireless' February 1 Wireless Implementation Report noted delays in implementation of Phase I services to the City of Richardson for the same reason. The argument raised by both Cingular Wireless and VoiceStream merely continues their ongoing claim that the underlying premise of Docket 94-102 is the protection of the financial interest of wireless carriers.

The City was pleased to report that since the last meeting held with the Wireless Bureau in December, two additional carriers have finalized testing of Phase I services for the City of Richardson. It remains unclear, however, why three carriers remain unable or

unwilling to fulfill their Phase I obligations some 23 months following receipt of a valid request for said service.

Respectfully submitted,

Joe Hanna, President

Directions

On Behalf of the City of Richardson

CC: Kris Monteith  
Bryan Tramont