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Federal Communications Commission
Washington, D.C. 20554

July 29, 2002

Robert T. Blau.
Vice President, Executive and Federal Regulatory Affairs
BellSouth Corporation
1133 21st Street, NW
Suite 900
Washington, D.C. 20036

Re: CC Docket No. 94-102 – In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems

Dear Mr. Blau:

As you may be aware, the Commission has established rules requiring commercial mobile radio service (CMRS) providers to provide enhanced 911 (E911) services to Public Safety Answering Points (PSAPs) under certain conditions.[1] Currently, CMRS carriers are working to implement E911 Phase II service pursuant to deployment deadlines established by Commission order.[2]

Throughout the course of the E911 proceeding, the Commission has recognized that incumbent Local Exchange Carriers (ILECs) play a vital role in wireless E911 implementation, because ILECs own and operate most of the country's 911 systems.[3] ILECs provide most of the Selective Routers, Automatic Location Information (ALI) databases, and trunks that carry 911 calls, and sometimes also provide certain PSAP equipment. Thus, ILECs are necessarily involved in providing to PSAPs certain of the services and facilities required to support wireless E911.[4]

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[1] *See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 18676 (1996). Under the Commission's rules, the E911 requirements are split into two phases. Phase I requires wireless carriers to provide to a requesting PSAP the telephone number of the originator of a 911 call and the location of the cell site or base station receiving the call. Phase II requires carriers to provide PSAPs with more precise latitude and longitude information about the 911 caller's location.

[2] *See e.g., Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Request for Waiver by Cingular Wireless LLC, *Order*, 16 FCC Rcd 18305 (2001); Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, *Order to Stay*, FCC 02-210 (rel. July 26, 2002); *In the Matter of AT&T Wireless Services, Inc.*, File No. EB-02-TS-002, Order, FCC 02-174 (rel. June 18, 2002); *In the Matter of Cingular Wireless*, File No. EB-02-TS-003, Order, FCC 02-132 (rel. May 9, 2002).

[3] *See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Second Memorandum Opinion and Order, 14 FCC Rcd 20850, 20887 (1999) (*E911 Second Memorandum Opinion and Order*).

[4] *See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas*, CC Docket No. 94-102, Order, 16 FCC Rcd 18982, 18986-7, para 16 (2001) (discussing the provision of 911 upgrades by ILECs in response to PSAP requests).

Indeed, the Commission has found that ILECs have an obligation to provide nondiscriminatory access to and interconnection with their networks for the provision of 911 and E911 services to wireless callers.[5] To date, the Commission has not imposed on ILECs any special obligations in connection with wireless E911, but has committed to monitoring their role in E911 implementation to determine whether additional obligations are necessary.[6]

As CMRS carriers implement E911 capability, and PSAPs make preparations to receive and use E911 information, ILECs are integrally involved in provision of this service. In many cases, upgrades to ILEC services or facilities are required to enable the ILEC to pass the E911 information from the CMRS carrier to the PSAP. In light of the role played by ILECs in E911 deployment, we have concluded that certain information from ILECs should be made publicly available. Therefore, pursuant to sections 218 and 403 of the Communications Act[7] and section 1.17 of the Commission's rules,[8] I request that you provide for inclusion in the public record in this proceeding written responses to the information requests set forth below by or before August 28, 2002.[9]

Specifically:

1. For each ALI database operated by your company, please identify:

    a. the database, including its location (by city and state, or by geographic region served by the database).
    b. all PSAPs served by the database (by jurisdiction).
    c. the type of interface that your company has installed, or will install, to support passage of Phase II information to PSAPs (e.g., E2, E2+, modified PAM).
    d. the routing solution(s) that the interface will support (e.g., NCAS wireline compatibility mode).
    e. the dates by which:
        i. any necessary database upgrades will be completed;
        ii. the interface will be available for any necessary testing with CMRS carriers, PSAPs, or third-party vendors; and
        iii. the interface will be available for launch of live E911 Phase II service to consumers.
    f. if unable to identify any of the dates specified in (e), the specific reasons for such inability.

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[5] *E911 Second Memorandum Opinion and Order*, 14 FCC Rcd at 20889-91.
[6] *Id.* at 20891, para.103.
[7] 47 U.S.C. §§ 218, 403.
[8] 47 C.F.R. § 1.17.
[9] The pendency of this information request does not relieve any party subject to the Commission's E911 requirements from its obligations as set forth in Commission orders.

2. For each ALI database operated by your company, specify:

    a. the type of data each database will be capable of receiving (e.g., latitude and longitude, confidence factor, uncertainty factor, address information);
    b. the format in which your company expects to receive data (i.e., what data fields will be used and which data will be required in each field); and
    c. whether the database will be capable of requesting updated location information (i.e., refresh capability).

3. Identify the manner in which your company expects wireless carriers, public safety entities, and/or third party vendors to interconnect with the ALI databases and selective routers your company operates (*e.g.*, specific trunking and messaging requirements). In particular, please:

    a. Specify whether specific trunk ordering procedures are in place.
        i. If so, indicate the standard interval for delivery of trunks (measured in business days).
    b. Specify whether Emergency Services Routing Key (ESRK)/Emergency Services Routing Digits (ESRD) policy or assignment procedures are in place.

4. Explain how the costs of upgrades to facilities operated by your company (e.g., ALI database, selective router, trunking) necessary to support wireless E911 will be recovered (*e.g.*, through tariffs, contracts or other arrangements). Please specify whether the mechanism for recovering these costs is currently in place, or, if not, when it will be in place.

5. Identify any other requirements necessary to launch wireless E911 Phase II service.[10]

You may provide your responses in tabular form, if you prefer. If you choose to submit your responses in tabular form, please use an Excel spreadsheet. Responses should be filed using the Commission's Electronic Comment Filing System (ECFS), pursuant to the filing procedures for *ex parte* submissions.[11] Responses sent through ECFS can be sent as an electronic file via the Internet to http://www.fcc.gov/e-file/ecfs.html. In completing the transmittal screen, filers should indicate their full name, Postal Service mailing address, and the docket number for this proceeding, CC Docket No. 94-102.

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[10] These data elements were derived, in part, from filings by Sprint PCS and the National Emergency Number Association (NENA). *See* Sprint May 2002 Second Quarterly E911 Implementation Report (filed April 29, 2002) at 4; Letter from Luisa L. Lancetti, Vice President, Regulatory Affairs, Sprint PCS to Magalie Roman Salas, Secretary, FCC (filed June 28, 2002); Letter from James R. Hobson, Counsel for NENA, to Marlene H. Dortch, Secretary, FCC (filed July 10, 2002).

[11] *See* 47 C.F.R. §§ 1.1200-1.1216.

If you choose to file by paper, please file two copies of your responses with Marlene H. Dortch, Secretary, Federal Communications Commission, 445 12th St., S.W., Washington D.C. 20554. Your response should indicate the docket number for this proceeding, CC Docket 94-102. In addition, please send a copy of your response to Jennifer Salhus, Policy Division, Wireless Telecommunications Bureau, Federal Communications Commission, 445 12th St. S.W., Washington D.C. 20554.

If you have any questions regarding this matter, please contact Jennifer Salhus of the Wireless Bureau's Policy Division at (202) 418-2823.

Thank you in advance for your cooperation in this matter. I look forward to receiving your prompt and complete response to the inquiries listed above.

Sincerely,

Thomas J. Sugrue
Chief, Wireless Telecommunications Bureau

cc: Kathleen B. Levitz

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