
**WIRELESS E 911
IMPLEMENTATION ISSUES**

**EX PARTE PRESENTATION
OCTOBER 23, 2002**

Many LECs Are Still Unready to Provide Phase II Services

- The Phase II Implementation Reports Indicate That Many LEC Providers of ALI Services Are Still Unready to Provide Necessary Phase II Services.

Certain LECs Ignore King County Decision

- Certain LECs Are Now Seeking to Charge Wireless Carriers for ALI Services. BellSouth, For Instance, Seeks to Impose a Charge of \$0.63 on Wireless Carriers Per ALI Dip, In Direct Violation of the Commission's Direction in the *King County* Decision.

LEC Delays Affect Wireless Implementation Deadlines

- Although Wireless Carriers Have Spent Countless Hours and Spent Millions of Dollars In An Effort to Meet the Phase II Deadlines, LEC Delays and Charges Will Likely Cause Many Wireless Carriers to Miss Phase II Implementation Deadlines.

ACTION REQUESTED

Clarify Requirements of Section 20.18(j)

- Clarification of Section 20.18(j) Is Required to Prevent Enforcement Action Against Wireless Carriers Due to Missed Phase II Implementation Deadlines.
- Section 20.18(j) Should Be Amended to State That Wireless Carriers Shall Begin Delivering Phase II Data Within Six Months of a PSAP Request or Within 120 Days After a PSAP Is In Fact Capable of Receiving and Using the Phase II Data, Whichever Is Later.

Direct LECs to Assign ALI Database Cost to PSAPs

- The Commission Should Issue a Directive Noting That ALI Database Costs Are To Be Allocated to PSAPs, and Requiring LECs to Finish ALI Database Upgrades Without Further Delay

Eliminate “Strict Liability” for Missed Deadlines Due Solely to LEC Delays

- The Commission Should Clarify That LEC Provisioning Delays Constitute a Defense to Any Enforcement Actions Taken Against a Wireless Carrier for Failure to Meet Phase II Deadlines.