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*Problem Solvers to the
Telecommunications Industry*

Standards Committee T1

November 15, 2002

Telecommunications
Industry Forum

VIA ELECTRONIC FILING

Ordering and Billing
Forum

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Network Interconnection
Interoperability Forum

Industry Numbering
Committee

Re: *Wireless Telecommunications Bureau Seeks Comment on Report on Technical and Operational Wireless E911 Issues*, WT Docket No. 02-46, Public Notice DA-02-2666 (October 16, 2002) ("Public Notice")

Protection Engineers
Group

Dear Ms. Dortch:

Standards Committee 05

Network Reliability
Steering Committee

Enclosed are Comments from the Alliance for Telecommunications Industry Solutions ("ATIS"), on behalf of the Emergency Services Interconnection Forum ("ESIF"), in response to the Commission's Public Notice, in the above-captioned matter.

Internetwork
Interoperability Test
Coordination Committee

Consistent with the Commission's Rules, I am filing one electronic copy of this Petition and request that you place it in the record of the proceedings. Please contact me at (202) 434-8847 if you have any questions or comments.

Telecommunications
Fraud Prevention
Committee

Sincerely,

Megan L. Campbell
General Counsel

International Forum on
ANSI-41 Standards
Technology

Enclosure

Interactive Voice
Response Forum

TTY Forum

Administrative Council for
Terminal Attachments

IMSI Oversight Council

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Megan L. Campbell
ATIS

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

Public Notice:)	
Wireless Telecommunications Bureau)	WT Docket No. 02-46
Seeks Comment on Report on Technical)	
And Operational Wireless E911 Issues)	DA-02-2666

**COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS
INDUSTRY SOLUTIONS (ATIS) ON BEHALF OF THE EMERGENCY
SERVICES INTERCONNECTION FORUM (ESIF)**

The Alliance for Telecommunications Industry Solutions¹ (“ATIS”), on behalf of the Emergency Services Interconnection Forum (“ESIF”), submits these Comments in response to the Federal Communications Commission (“FCC” or “Commission”) Public Notice (DA-02-2666) issued in the above-captioned proceeding. The Public Notice solicits comments on the Report on Technical and Operational Issues Impacting the Provision of Wireless Enhanced 911 (“E911”) Services by Dale N. Hatfield, filed with the FCC on October 15, 2002. (“Hatfield Report”).

As a general matter, the ESIF applauds the Commission’s inquiry into the technical and operational issues affecting the deployment of wireless E911 and, supports the principle findings and recommendations of the Hatfield Report. These Comments reinforce that

¹ ATIS is a United States based body that is committed to rapidly developing and promoting technical and operations standards for the communications and related information technologies industry worldwide using a pragmatic, flexible and open approach. ATIS has sixteen (16) open industry committees and forums currently in operation ranging in subject matter from the development of American National Standards for network interconnection and interoperability to the development of industry guidelines dealing with numbering resources and access ordering, provisioning and billing. For further information please visit www.atis.org.

general support and specifically address those areas where the ESIF is well positioned to serve as a resource on technical and operational issues. A brief description of the ESIF and its current areas of focus are provided in Section I, with the specifics relative to the Hatfield Report found in Section II.

I. The Emergency Services Interconnection Forum (ESIF)

As discussed in the Hatfield Report, the ESIF was formed to give stakeholders a forum for the identification and resolution of technical issues related to the interconnection of telephony and emergency services networks.² The ESIF has successfully brought together the stakeholders, including local exchange carriers, wireless carriers, location technology developers/providers, public safety organizations, mobile handset manufacturers and vendors of network equipment in an effort to determine the best practices and solutions necessary to deploy and implement wireless E911 services.

At current, the ESIF has four active study groups (B through E) with the following areas of focus:

Study Group B: examination of the interaction between the engineering and operational dynamics of wireless E911 telephony and the embedded wireline 911 technology in order to aid in the development of deployment and operational guidelines for wireless carriers, wireline E911 services providers and public safety organizations. The goal is network integrity and reliability as well as

² The ESIF is a sponsored committee of ATIS jointly convened by ATIS and the National Emergency Number Association (“NENA”). Further information regarding the work of the ESIF may be found at www.atis.org/atis/esif/esifhome.htm

effective troubleshooting processes. This group is also responsible for examining wireless E911 issues resulting from the lack of an available call-back number.³

Study Group C: issues relating to the methods and types of interconnection between the wireless carriers and the emergency services network. For example, this group is working to identify a consistent and nationally accepted practice on how best to present the uncertainty factor accompanying a location estimate that is provided to the Public Service Answering Point (PSAP).

Study Group D: issues relative to the newly formed Department of Homeland Security. For example, this group is working to develop technical and operational requirements for the establishment of an emergency communications link between local, city, county and federal emergency response agencies to local exchange and wireless carriers helping to ensure an immediate response to a declared emergency.

³ The ESIF, through ATIS, filed a Request for Stay and Petition for Reconsideration in response to an Order, in which the FCC amended its rules requiring donated non-service initialized phones and newly manufactured 911-only wireless handsets to be programmed with the code 123-456-7890 as the telephone number/mobile identification number to alert PSAPs that a 911 call is being made from a wireless phone that lacks call-back capability. See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Non-Initialized Phones, Request for Stay of ATIS and Petition for Reconsideration of ATIS, CC Docket No. 94-102, RM-8143 (June 12, 2002). The Commission granted the stay, pending consideration of ATIS/ESIF Petition for Reconsideration. See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, Non-Initialized Phones, Order, CC Docket No. 94-102, RM-8143 (released September 30, 2002).

Study Group E: develop documentation for PSAPs to use in satisfying the Richardson Order Verification requirements.⁴ For example, this group is working to develop a PSAP readiness package. The package will include a checklist, recently completed, and intended to serve as a guideline for PSAPs when providing information to carriers regarding PSAP readiness.

II. The Hatfield Report

As a general matter, the ESIF supports the Hatfield Report recommendation that the Commission suggest to the Administration that a “National 911 Program Office” be established within the proposed Department of Homeland Security. Given the important role of the E911 system, integration and coordination with the homeland security infrastructure is critical. Having a “National 911 Program Office” would facilitate the implementation of a fully integrated system. Likewise, the ESIF supports the concept of necessary Commission oversight of the rollout of wireless E911 services in the United States.

With respect to the Hatfield Report recommendation regarding the establishment of an advisory committee to address the technical framework for the further development and evolution of E911 systems and services, the ESIF would like to express its willingness, as an industry body of subject matter experts, to serve as a resource to the Commission or, if

⁴ In the Matter of Revision of the Commission’s Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, CC Docket No. 94-102, Petition of City of Richardson, Texas (released October 17, 2001).

established, its advisory committee on technical and operational issues.⁵ The ESIF is functioning in this capacity today by providing technical information to the Commission on the issue of call-back numbers for non-service initialized handsets.⁶ As an established forum with knowledgeable participants from the stakeholder entities, the ESIF is well positioned to be a resource to the FCC in the area of technical and operational issues.

The ESIF strongly supports the Hatfield Report recommendation that the Commission continue to urge the creation of organizations at the state, regional and local levels of government that can act as coordinating bodies. The ESIF, in its work thus far, recognizes the benefits of stronger coordination and awareness at the state, regional and local levels of government. Such bodies could address issues relevant to small and rural PSAPs, for example, uneven service coverage and funding.

The ESIF believes that the emphasis placed on industry-based voluntary standards activities in the Hatfield Report is appropriate and, that the identified need for the coordination and overall review of such activities is necessary for the successful rollout of enhanced services and the eventual evolution of the E911 system. The ESIF, having done an initial examination while defining the forum's mission and scope, would be

⁵ Should the Commission establish an advisory committee in the nature of the Federal Advisory Committee Act (FACA), the ESIF could serve as an industry resource for technical and operational issues relating to the development and evolution of E911 systems and services. This is very similar to other situations where the ATIS Industry Numbering Committee (INC) provides technical and operational information and work to the North American Numbering Council (NANC), an FCC Federal Advisory Committee and, the ATIS Network Reliability Steering Committee (NRSC) an industry committee that has performed work in connection with the FCC's Network Reliability and Interoperability Councils.

⁶ In support of the ATIS/ESIF Petition for Reconsideration cited in Note 3 above, the ESIF has provided technical information in response to FCC staff questions.

willing to review the current environment and perform a function relating to the coordination of standards activities.

The ESIF strongly supports the Hatfield Report recommendation regarding the issue of PSAP readiness as evidenced by the Forum's work on the issue. The ESIF recently completed a deliverable entitled "Wireless E911 Phase II Readiness Checklist." This document will provide a national guideline that PSAPs may use in responding to requests from wireless service providers regarding the PSAPs state of readiness for Phase II service.

The ESIF supports the need for testing on an industry-wide basis as recommended in the Hatfield Report. In terms of the specific recommendation in the Hatfield Report for the development of industry-wide testing and certification, the ESIF is currently planning to develop basic parameters for location verification.

III. Conclusion

The ESIF shares the Commission's focus on the deployment of wireless E911 services and applauds the Hatfield Report's emphasis on the necessary evolution of the E911 system and services. The ESIF offers its continued support to the Commission on matters related to technical and operational aspects.

Respectfully submitted by,

ATIS on behalf of the ESIF

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November 15, 2002