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ATTORNEYS AT LAW

November 19, 2002

Ex Parte – Via Electronic Filing

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

Re: CC Docket No. 94-102
Notice of Ex Parte Communication

Dear Ms. Dortch:

On November 18, I spoke separately by telephone with John Branscome, Interim Legal Advisor to Commissioner Abernathy, and Sam Feder, Legal Advisor to Commissioner Martin, concerning the pending petitions for reconsideration of the *Richardson* decision. My comments were consistent with the letter filed by T-Mobile USA, Inc. ("T-Mobile," formerly VoiceStream Wireless Corporation) in this docket on November 14, 2002. In particular, I noted that the complexity of E911 deployment, and the interdependence of the parties (mobile carrier, PSAP, LEC and equipment vendors) require that the Commission recognize equitable tolling of the six-month implementation period imposed by Section 20.18(d) where implementation of a request is due to matters beyond the carrier's control.

In accordance with FCC rules, a copy of this letter is being filed electronically in the above-captioned docket.

Sincerely,

/s/

Karen L. Gulick
Counsel to T-Mobile USA, Inc.

cc: John Branscome
Sam Feder