

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of

Report on Technical and Operational Issues  
Impacting the Provision of Wireless  
Enhanced 911 Services

WT Docket No. 02-46

**REPLY COMMENTS OF VERIZON<sup>1</sup>**

The comments demonstrate that the best way for the Commission to promote deployment of wireless E911 service is to support creation of a National 911 Program Office in the Department of Homeland Security and to create an advisory committee that represents all government, industry, and public interest stakeholders. Although the comments raise several technical issues concerning wireless E911 service, these are the types of issues that should be addressed in the first instance by the advisory committee. On the issue of readiness to deploy wireless E911 service, the Commission should examine each carrier's performance rather than accept broad-brush criticisms. A critical factor is the ability of the public safety answering points ("PSAPs") to obtain the resources to implement their responsibilities under "Phase II" of wireless E911 service. The Commission should recommend establishment of public funding mechanisms to support PSAPs and carriers in place of the telecommunications surcharges that many states are currently using.

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<sup>1</sup> The Verizon telephone companies ("Verizon") are the affiliated local telephone companies of Verizon Communications Inc. These companies are listed in Attachment A.

**The Commission Should Promote Deployment Of Wireless E911 Service By Focusing Its Efforts On Creation Of A National 911 Program Office And An Advisory Committee.**

Most commenters agree with the Hatfield Report's observation that there is a need for increased coordination and cooperation among government and private entities to implement wireless E911 services as quickly as possible. In addressing these issues, the Commission should focus on the process improvements rather than try to resolve specific issues that are raised in the comments. The best way to address the technological and practical challenges that the carriers and the PSAPs face in implementing wireless E911 service is to encourage development of consensus recommendations by all stakeholders in public forums.

Several commenters supported the Hatfield Report's recommendations for creation of a National 911 Program Office within the new Department of Homeland Security to coordinate executive department guidance and support on public safety issues and for establishment of an advisory committee to address technical issues, to suggest industry standards, and to make policy recommendations for implementing E911 service. *See, e.g.*, NENA, 5-6; RCC Consultants, 3; CTIA, 8-12. However, as CTIA notes (at 8-10), creating the advisory committee under the Federal Advisory Committee Act would subject it to procedural requirements that would limit its flexibility and responsiveness. Verizon agrees that the advisory committee should not be subject to the procedural requirements of that act. Rather, the Commission should establish the advisory committee as a voluntary forum representing all stakeholders that would develop policy recommendations and technical standards for adoption by government agencies and the private sector.

While some commenters argue that the Commission should rely upon the existing Emergency Services Interconnection Forum (“ESIF”) to perform the advisory function,<sup>2</sup> that body is focused primarily on technical issues, whereas an advisory committee would encompass broader policy issues and therefore would need to represent a broader spectrum of stakeholders. If the ESIF were used to perform the advisory function, it would be necessary to expand the scope and membership of the forum to develop a full range of recommendations for development of wireless E911 services.

**The Commission Should Implement Procedural Improvements Rather Than Trying To Resolve Specific Issues Raised In The Comments.**

An example of an issue that should be addressed in an industry forum is RCC Consultants’ argument (at 8-9) that wireless E911 calls should be routed to the appropriate PSAP using the coordinates of the caller rather than the location of the cell site that receives the call. According to RCC, this would remedy the “misrouting” of calls to the wrong PSAP that occurs when the cell site is in a different local jurisdiction than the caller’s location. *See also* T-Mobile, 20-22. However, RCC admits that waiting for the wireless system to locate the coordinates of the customer and to send this to the selective router before the call is completed to the PSAP could delay delivery of the call by as much as 30 seconds, which is an unacceptable amount of time that could cause the customer to abandon the call or fail to obtain help when needed. While further technological developments could reduce this delay to an acceptable level, this is the type of issue that should be submitted to an advisory council for development of a recommendation to the Commission after all parties have had an opportunity to provide input on the technical and policy issues.

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<sup>2</sup> *See, e.g.*, Spirent, 3; TIA, 4.

**The Commission Should Recommend A Public Funding Mechanism To Aid The PSAPs And The Carriers In Implementing Wireless E911 Service.**

Because the PSAP request for “Phase II” wireless E911 service is the starting point for the six-month deadline under the Commission’s rules, PSAP readiness is a major factor limiting rollout of wireless E911 service. Several commenters agree with Verizon that the lack of an adequate funding mechanism is a major contributor to the problem of “PSAP fatigue” in meeting the numerous responsibilities that have been placed on them. *See, e.g.*, CTIA, 12-13. In addition, for wireless carriers as well, especially in rural areas, obtaining the financial resources for network upgrades to meet Phase II requirements is an issue. *See, e.g.*, NTCA, 2; RTG, 4-5; Rural Cellular Corp., 2; PetroCom, 4. Adding surcharges to wireless carrier bills is not an adequate solution to what is a public policy objective that transcends the needs of wireless customers. *See, e.g.*, Rural Cellular Corp., 5. As Verizon stated in its comments, the Commission should explore the issue of a public funding mechanism to support implementation of wireless E911 service and make the appropriate recommendations to federal and state legislatures.

**The Commission Should Examine Local Exchange Carrier Readiness Issues On An Individual Basis Rather Than Accept Blanket Criticisms.**

Some commenters share the Hatfield Report’s undue criticisms of the readiness of the incumbent local exchange carriers to implement wireless E911 service.<sup>3</sup> The Commission should not take a broad-brush approach in evaluating this issue. Rather, the Commission should look at each carrier individually in determining whether it has carried out its responsibilities in meeting the Commission’s deadlines for implementation of wireless E911 service. As Verizon

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<sup>3</sup> *See, e.g.*, TruePosition, 5-6; T-Mobile, 7-11; AT&T Wireless, 3; Sprint, 7.

noted in its comments, it is prepared to meet PSAP requests to begin implementing Phase II service in all of its service areas.

The Commission also should distinguish between initial testing issues and compliance with the Commission's deadlines for implementation of wireless E911 service. The only criticism of Verizon's performance is Nextel's description of problems with trunk facilities in certain areas in Virginia. *See* Nextel, 3. However, as with the application of any new technology, cooperative testing among all parties is essential during the initial installation. In this particular case, neither Nextel nor their vendor attempted to coordinate testing in advance with the Verizon wireless test team. Once the Verizon team was notified by Nextel concerning its connectivity problems, the appropriate analysis, trouble determination, and resolution were accomplished within a week. This example simply demonstrates the need for cooperation and coordination among all parties in deploying the complex Phase II technologies and it should not be seen as a lack of technical readiness.

**The Commission Should Refer The Issue Of Introducing New Technologies Into The Wireline 911 System To An Advisory Committee.**

Some commenters echo the Hatfield Report's inaccurate characterization of the wireline E911 system as "antiquated" for not using the SS7 signaling architecture to send location data on wireless 911 calls. *See, e.g.*, NENA, 1; CTIA, 3-4. However, even these commenters recognize that the SS7 system, like the multifrequency signaling initially used for 911 calls, was designed for call set-up and is not engineered to act as a transport medium for wireless location data. *See, e.g.*, NENA, 3, 16. The issue of whether incorporation of a particular technology will improve the efficiency and reliability of the 911 system should be evaluated in the first instance by an advisory committee to develop a consensus recommendation for the Commission's

advisory committee to develop a consensus recommendation for the Commission's consideration.

## CONCLUSION

Rather than focus on particular issues raised in the comments, the Commission should move forward on the recommendations for process improvements by supporting establishment of a National 911 Program Office within the new Department of Homeland Security and by sponsoring an advisory committee representing all stakeholders. In addition, the Commission should support a public funding mechanism to assist PSAPs and carriers in implementing wireless E911 service.

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THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States  
GTE Midwest Incorporated d/b/a Verizon Midwest  
GTE Southwest Incorporated d/b/a Verizon Southwest  
The Micronesian Telecommunications Corporation  
Verizon California Inc.  
Verizon Delaware Inc.  
Verizon Florida Inc.  
Verizon Hawaii Inc.  
Verizon Maryland Inc.  
Verizon New England Inc.  
Verizon New Jersey Inc.  
Verizon New York Inc.  
Verizon North Inc.  
Verizon Northwest Inc.  
Verizon Pennsylvania Inc.  
Verizon South Inc.  
Verizon Virginia Inc.  
Verizon Washington, DC Inc.  
Verizon West Coast Inc.  
Verizon West Virginia Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on this 3<sup>rd</sup> day of December, 2002, copies of the foregoing  
“Reply Comments of Verizon” were sent by electronic mail to the parties listed below.

A handwritten signature in black ink, appearing to read "Barry J. Ohlson", is written over a horizontal line.

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