

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

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket 94-102
to Ensure Compatibility with Enhanced)	
911 Emergency Calling Systems)	

Petition for Limited Waiver, TTY Compatibility

To: Chief, Wireless Telecommunications Bureau

COMMENTS OF NENA, APCO AND NASNA

Eight days before its compliance deadline, SLO Cellular ("SLO") asked for an extension to March 31, 2003 of the TTY digital compatibility requirements in Section 20.18(c) of the Rules. No reason is given for the extension request and it may not be granted in its present form.

SLO most recently filed a waiver petition in this matter on June 28, 2002. There, it explained at some length the basis for the petition. The petition was followed, on July 15th and October 15th, by status reports updating the vendor service schedules which had prompted the initial request.

The Commission should insist on a similar status report, covering the period since October 15, 2002, before it acts on SLO's most recent extension request. Carriers such as SLO

should be informed, in no uncertain terms, that requests filed as late as this one, and with no support, are unacceptable and will not be tolerated.

Respectfully submitted,

NENA, APCO AND NASNA

By _____

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January 2, 2003

Certificate of Service

A copy of the foregoing Comments was served by e-mail attachment today on:

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January 2, 2003

James R. Hobson