

August 4, 2003

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: T-Mobile USA, Inc. E-911 Quarterly Report (Updated)

Dear Ms. Dortch:

In accordance with the terms of the consent decree between T-Mobile USA, Inc. (“T-Mobile”) and the Federal Communications Commission (“FCC” or “Commission”) related to T-Mobile’s deployment of E-911 Phase II services, T-Mobile hereby submits its Updated August 1, 2003 E-911 Quarterly Report (“Report”).¹

I. Phase II Rollout Plan

Paragraph 8(g) of the T-Mobile Consent Decree requires T-Mobile to submit a Phase II rollout plan describing how it will prioritize valid PSAP requests and deploy Phase II service in its network. The following is a description of T-Mobile’s rollout plan and prioritization scheme.²

¹ *In the Matter of T-Mobile, USA, Inc.*, Order, File No. EB-02-TS-012, FCC 03-172 (rel. July 17, 2003) (“T-Mobile Consent Decree”). Please note that this letter and attachment are updates to the documents filed with the Commission on August 1, 2003. T-Mobile has included information on PSAP Entity ID numbers, and information regarding a Phase I request from the City of Reno, Nevada, which were inadvertently omitted from the previous submission. For the convenience of the Commission, we are resubmitting the Report in its entirety.

² In prioritizing its benchmarks under the T-Mobile Consent Decree, T-Mobile “must give priority to markets with pending valid PSAP requests first.” See T-Mobile Consent Decree at ¶ 8(a)(1)-(5).

As the Commission is aware, T-Mobile announced in the spring that it was switching from a handset-based Enhanced Observed Time Difference (“E-OTD”) solution to a network-based Time Difference of Arrival (“TDOA”) solution for delivering Phase II location information to PSAPs.³ Since then, T-Mobile has carefully evaluated various vendors’ proposals for deploying TDOA in its network, and selected TruePosition to provide its Uplink-TDOA (“U-TDOA”)-based Phase II solution to T-Mobile.⁴ It has also worked with TruePosition to agree on testing issues and on timeframes for the provisioning of TDOA equipment and software in T-Mobile’s markets (including as necessary transitioning markets where PSAPs are receiving Network Safety Solution (“NSS”)⁵ and E-OTD information to TDOA).

The first step in T-Mobile’s Phase II rollout plan is the completion of First Office Application (“FOA”) testing to uncover and resolve any interoperability issues that might arise between vendor equipment and software and T-Mobile’s network infrastructure. T-Mobile’s FOA is currently underway in its Seattle, WA market. Once interoperability issues, if any, are addressed, T-Mobile can finalize vendor production of the necessary equipment and software, and proceed to install and activate those products in its network.

T-Mobile has already begun the initial analysis and design work for the markets to be deployed in order to meet the first deployment milestone in the T-Mobile Consent Decree: installation of 1000 LMUs at T-Mobile’s cell sites by April 19, 2004.⁶ Further, T-Mobile has established plans to deploy its markets going forward in such a fashion as to meet all the deployment and activation benchmarks contained in its consent decree. T-Mobile’s plan is designed to achieve the swiftest possible deployment of Phase II equipment and services across all of T-Mobile’s markets nationally. However, as the consent decree recognizes, T-Mobile is relying on the representations of its vendors in its plans to meet the deployment schedule contained therein.⁷ Further, other issues such as PSAP readiness or LEC issues may impact a carrier’s ability to deliver Phase II

³ See Letter from Robert A. Calaff, Senior Corporate Counsel, Governmental and Industry Affairs, T-Mobile USA, Inc., to John B. Muleta, Chief, Wireless Telecommunications Bureau, Federal Communications Commission, and David H. Solomon, Chief, Enforcement Bureau, Federal Communications Commission, CC Docket No. 94-102, filed March 21, 2003.

⁴ See “TruePosition Selected by T-Mobile USA for GSM E911 Location Solution,” available at http://www.trueposition.com/Press/news_07.23.03_tmobiler.html. U-TDOA calculates a mobile phone’s location by comparing the difference in the times at which a signal transmitted from the phone reaches three or more Location Measurement Units (“LMUs”) installed in a wireless carrier’s base stations.

⁵ NSS provides location information accurate to 1000 meters or less to PSAPs. T-Mobile deployed NSS throughout its network in 2002, regardless of whether it had received a request from a PSAP for Phase II service.

⁶ See T-Mobile Consent Decree at ¶ 8(a)(1).

⁷ See T-Mobile Consent Decree at ¶ 8(c).

information to PSAPs under a consent decree, as the Enforcement Bureau has recently acknowledged.⁸

T-Mobile is giving priority to markets with pending valid PSAP requests in its deployment plan. The markets T-Mobile plans to deploy to meet its April 2004 benchmark include PSAPs in T-Mobile's Houston, TX market that have pending valid requests for Phase II service, and PSAPs in T-Mobile's Minneapolis, MN market that are currently receiving NSS information from T-Mobile. In order to meet T-Mobile's second benchmark under its consent decree – deploy Phase II technology at 4,000 cell sites and provide Phase II service at 2,000 of those sites by August 17, 2004⁹ – T-Mobile plans to install equipment and activate service in its St. Louis, MO market (including PSAPs currently receiving E-OTD information), Virginia market (including PSAPs currently receiving NSS information), and Seattle, WA market (including PSAPs currently receiving NSS information). Further, the attached report provides T-Mobile's current estimate of projected completion dates for each Phase II request. These may be subject to adjustment depending on external factors such as vendor performance, and PSAP and LEC readiness, and could potentially change.

II. Phase I and Phase II Requests

Paragraph 10(a) of the T-Mobile Consent Decree requires that T-Mobile provide certain information on all pending Phase I and Phase II requests it has received. **Attachment A** to this Report provides the required information. This attachment mirrors the standardized reporting spreadsheet the Commission stated this June that Tier I carriers, including T-Mobile, should include with their Quarterly Reports beginning August 1, 2003.¹⁰

⁸ See *In the Matter of AT&T Wireless Service, Inc.*, Order, File No. EB-02-TS-002, DA 03-1776 (rel. May 23, 2003); *In the Matter of Cingular Wireless LLC*, Order, File No. EB-02-TS-003, DA 03-1777 (rel. May 23, 2003).

⁹ See T-Mobile Consent Decree at ¶ 8(a)(2).

¹⁰ Public Notice, *Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, CC Docket No. 94-102 (rel. June 6, 2003). T-Mobile has only included the fields for PSAPs from which it has received Phase I and Phase II requests. (T-Mobile automatically considers a request for Phase II information as a request for Phase I information.) However, T-Mobile's records do not perfectly match the PSAP Registry supplied by the FCC in its Public Notice – there are 97 PSAPs covered by Phase I and Phase II requests for which T-Mobile cannot determine the appropriate FCC PSAP ID number. T-Mobile has added a field to its spreadsheet known as the "PSAP Entity ID" – a PSAP-specific code used by the industry and public safety to identify individual PSAPs and which T-Mobile has loaded into its GMLC. (The first two digits of the PSAP Entity ID identify the state, the next three digits the county, and the last three digits the PSAP entity within the county.) T-Mobile has cross-correlated FCC PSAP ID numbers with PSAP Entity IDs wherever possible.

Attachment A lists all PSAPs covered by requests for Phase I and/or Phase II service received by T-Mobile as of July 31, 2003. T-Mobile has indicated which requests have been deployed and the dates of deployments (note that in a number of cases T-Mobile has deployed E911 service to a PSAP without receiving a request from the PSAP but, in anticipation of receiving such a request, worked with the PSAP and its service provider to complete the deployment). Where a PSAP's request has not been fulfilled, T-Mobile has supplied the projected deployment date,¹¹ and the reason(s) for delay if a PSAP's Phase I request has not been satisfied in 6 months under the Commission's rules. T-Mobile's projected deployment dates reflect its current estimate of when it should satisfy a PSAP's request for Phase I or Phase II services; these dates, however, depend on external factors such as vendor performance, and PSAP and LEC readiness, and could potentially change.

Regarding the field labeled "Invalid Request" on the spreadsheet, T-Mobile has placed a "Y" in the field to designate a PSAP's request as invalid in cases where T-Mobile: (a) currently does not have coverage in the area for which the PSAP is responsible and where as a result the request is invalid under the Commission's Rules;¹² (b) has filed a certification with the FCC pursuant to the Richardson Recon Order;¹³ or (c) has not received all the documentation required under the Richardson Order¹⁴ to determine PSAP readiness (T-Mobile has also noted where the requests are classifiable as "tolled" if received after the effective date of the Richardson Recon Order.) **With the exception of instances in which it does not have coverage, however, T-Mobile's operating policy is not to delay implementation based on questions about the validity of a particular request, but to proceed to deploy the request as much as possible.** T-Mobile does reserve the right in the future to assert the invalidity of a request, or to file a certification with the FCC regarding a particular request, should circumstances arise that warrant such action, notwithstanding the fact that it does not categorize a particular request as invalid in this Report.

III. T-Mobile Location Technology

¹¹ In the case of PSAP requests in the states of California and Nevada, T-Mobile is relying on the projected deployment dates given to it pursuant to the joint venture company established by T-Mobile and Cingular Wireless for the provision of services in those states. See "Cingular, VoiceStream to Share Wireless Networks in New York, California and Nevada," available at <http://www.t-mobile.com/company/pressroom/pressrelease19.asp>.

¹² See 47 C.F.R. § 20.18(a).

¹³ *Petition of City of Richardson*, Order on Reconsideration, CC Docket No. 94-102, 17 FCC Rcd 24282 (2002) ("Richardson Recon Order"), *recons. pending*.

¹⁴ *Petition of City of Richardson*, Order, CC Docket No. 94-102, 16 FCC Rcd 18982 (2001) ("Richardson Order").

Paragraph 10(b)(1) of the T-Mobile Consent Decree requires that each Quarterly Report contain a statement of whether T-Mobile's network based technology for delivering Phase II information meets the Commission's network based accuracy requirements.¹⁵

Under the agreement between T-Mobile and TruePosition, TruePosition is obligated to deliver location technology that complies with the FCC's requirements for network-based location technologies – accuracy to within 100 meters for 67% of calls and 300 meters for 95% of calls. The results of TruePosition's most recent trial provide substantial evidence that its technological solution should enable T-Mobile to comply with the Commission's accuracy requirements for network-based solutions. This trial was conducted on Cingular's network in and around Wilmington, Delaware. A total of 1529 location estimates were computed across the test area. Testing involved stationary, moving, and in-building calls. Location results were computed uniformly across the entire test area in each of the above scenarios (moving, stationary or in-building), with summary results from each area weighted by scenario and statistically combined to compute aggregate results.

In summary, 67% of the location estimates in TruePosition's trial had an error less than 47.1 meters, and 95% of the location estimates had an error less than 112.2 meters, well within the FCC's requirements for network-based solutions. These results did not vary in any meaningful way across handsets employed in the tests or manufacturers of those handsets.

IV. NSS/E-OTD

Pursuant to paragraph 10(b)(10) of the T-Mobile Consent Decree, T-Mobile confirms that it continues to provide NSS location information to PSAPs for all deployments that were receiving and utilizing such location information as of the Effective Date of the decree. T-Mobile has also contacted each of the PSAPs receiving E-OTD location information as of the Effective Date of the decree, and will work with these PSAPs to agree on a date for the termination of the provision of E-OTD information and the transition to the provision of TDOA location information. T-Mobile will shortly be contacting each of these PSAPs with a proposed transition plan for the migration from E-OTD to TDOA.

¹⁵ Paragraph 10(b) of the T-Mobile Consent Decree requires that T-Mobile's Quarterly Reports contain statements regarding whether T-Mobile has met each deployment benchmark falling due in the period immediately preceding the Quarterly Report. T-Mobile does not include these statements (which correspond to Paragraphs 10(b)(2)-(9)) in this Report, as none of these requirements have fallen due in the last quarter. In addition to responding to Paragraph 10(b)(1), T-Mobile provides a response to Paragraph 10(b)(10) below.

Finally, included with this letter is a declaration from an officer of T-Mobile attesting to the truth and accuracy of this Report, pursuant to Paragraph 10 (c) of the T-Mobile Consent Decree. T-Mobile is serving this Report on the Executive Directors and counsel for the Association of Public-Safety Communications Officials-International, Inc., the National Emergency Number Association, and the National Association of State Nine One One Administrators, as provided for in the decree. Please contact the undersigned should there be further questions.

Respectfully submitted,



Robert A. Calaff
Senior Corporate Counsel –
Governmental & Industry Affairs

Attachment

cc: David H. Solomon, Chief, Enforcement Bureau
John B. Muleta, Chief, Wireless Telecommunications Bureau
Tim Ryan, Interim Executive Director, APCO
Robert Gurss, Director of Legal and Government Affairs, APCO
Terry Peters, Executive Director, NENA
James R. Hobson, Counsel, NENA
Steve Marzolf, President, NANSA

Bryan Tramont, Office of Chairman Powell
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Patrick Forster, Wireless Bureau

Lisa Fowlkes, Enforcement Bureau
Katherine Berthot, Enforcement Bureau

DECLARATION OF TIMOTHY WONG

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Executed on August 4, 2003



Timothy Wong
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Chief Technology Officer
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