OVERVIEW OF THE CALL PROCESSING METHODOLOGIES APPROVED IN THE SECOND REPORT AND ORDER

- **WCA explicitly stated that the underlying analog technical standard would have to be significantly changed in order for the Commission to adopt WCA's preferred method of call completion.**

  WCA acknowledged that a call completion mode that required more than the assignment of a voice channel to the handset "**WILL** require a revision of the 553 [analog] Standard, since the subscriber units do not currently possess this function." *See* Ex Parte presentation of Ad Hoc Alliance for Public Access to 911, CC Docket No. 94-102, Trott Report at 4 (filed Mar. 20, 1998) (emphasis in original).

- **By contrast, the Commission made clear in the Second Report and Order (SRO) that it was not contemplating, let alone mandating, major changes to the 553 Standard.**

  To the contrary, it explicitly stated that the approved 911 call processing modes -- Automatic A/B-Intelligent Retry (AB-IR), Adequate/Strongest Signal and Selective Retry -- should *not* disrupt the overall operation of 911 service, including the networks of wireless carriers and public safety organizations. SRO ¶ 29.

  Automatic A/B-IR. The Commission recognized that the industry standards body may review these methods, including A/B-IR, but "[i]n the meantime" the Commission was satisfied that A/B-IR as approved by the Commission meets the Commission's basic objectives and should improve the status quo. SRO ¶ 42. That is, the Commission found that A/B-IR as approved did not require significant standards changes. *See id.*; *see also* SRO ¶ 90 (the Commission does not believe that it "should delay taking action to await further review of . . . issues by standards bodies or other groups"); SRO ¶ 35 n.47 (approvingly noting TIA's statement that changes necessary for A/B-IR could be implemented within existing standards).

  Adequate-Strongest Signal. The Commission found the Adequate/Strongest Signal mandate to be cost effective. It found that implementation of strongest signal would require only changes in handset software that could be quickly and inexpensively implemented. SRO ¶ 57.

  Selective Retry. The Commission expressly stated that this method should be simple and inexpensive to add to handsets and should not disrupt or otherwise interfere with network or emergency response operations. The Commission added that the use of Selective Retry should be readily available to all handset manufacturers. SRO ¶ 75.

- **The Commission explicitly recognized that A/B-IR would "require only relatively modest changes in handset software that should not be unduly expensive and should not take long to incorporate into mobile units."** SRO ¶ 35

- **The Commission noted that the methods it approved in the SRO improved the status quo, but acknowledged that each had limitations and disadvantages.**

  The Commission explained that the purpose of requiring new call processing methods "is to improve 911 reliability [and] increase the *probability* that 911 calls will be efficiently and successfully transmitted to public safety agencies . . . ". SRO ¶ 2 (emphasis added) It clearly recognized that, in some cases, callers may still encounter circumstances where the handset fails to deliver a 911 call adequately. SRO ¶ 3. The relevant question is not whether the approved call processing methods provide a "final and perfect solution" but whether they improve the status quo with regard to 911 calls. SRO ¶¶ 27, 55.

  The Commission noted that "the present limits of technology deprive [it] of the opportunity to craft perfect solutions," pointing out that the methods approved in the SRO "are not infallible." SRO ¶ 3. Each of the approved methods has "advantages and limitations that may affect its desirability for particular customers, and . . . each may display unanticipated advantages and disadvantages in actual practice." SRO ¶¶ 27, 78.

- **The SRO specifically noted that WCA's Adequate/Strongest Signal method could result in "lock-in."**

  The Commission expressly recognized that the Adequate/Strongest Signal method may route some calls away from the preferred carrier even when the preferred carrier could have completed the call and the non-preferred carrier to whom the calls are routed lacks available channels. The Commission characterized this problem as "another type of 'lock-in,' because once the strongest signal algorithm selects a carrier, the caller is stuck with that carrier and may not even be able to access the other carrier by redialing." SRO ¶ 79

- **Even with these acknowledged limitations, however, the Commission found that each of the approved methods "offers benefits under certain circumstances, as compared to the status quo . . .".** SRO ¶ 27.

  It noted that these "improvements . . . should significantly increase the reliability of using wireless phones to reach emergency help." SRO ¶ 3.