



February 1, 2005

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

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 February 2005 E-911 Quarterly Report (“Report”).¹

Since our last Quarterly Report in November, T-Mobile has continued to make significant progress in its E-911 deployment efforts. To date, T-Mobile has deployed 1093 of the Phase I requests encompassed by this report where it has coverage. The total number of PSAP entities receiving Phase I information from T-Mobile as a result of these deployments is 2467.

With respect to Phase II, T-Mobile continues to make significant deployments of its network-based Uplink-Time Difference of Arrival (“TDOA”) solution for delivering Phase II location information to PSAPs.² As this work proceeds, T-Mobile continues to deliver its interim Phase II Network Safety Solution (“NSS”) ³ to PSAPs as required,

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”).

² 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.

³ NSS provides location information accurate to approximately 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.

even as it transitions those communities to TDOA. T-Mobile anticipates that it will continue to fulfill the requirements contained in its consent decree to deploy Phase II services across its markets in a timely fashion.⁴ In fact, to date T-Mobile has deployed 291 of the Phase II requests encompassed by this report where it has coverage, and a total of 865 PSAP entities are currently receiving Phase II information under these deployments.

I. Phase I and Phase II Requests

Paragraph 10(a) of T-Mobile's 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 follows the standardized reporting spreadsheet the Commission requires that Tier I carriers, including T-Mobile, should follow for their Quarterly Reports.⁵

Attachment A lists all PSAPs covered by requests for Phase I and/or Phase II service received by T-Mobile as of January 14, 2005.⁶ 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 Phase I 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, and the reason(s) for delay if a PSAP's Phase I request has not been satisfied within 6 months from the date of receipt of the request. 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 "Yes" 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

⁴ 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. See T-Mobile Consent Decree at ¶ 8(c). Further, other issues such as PSAP readiness or LEC issues may impact a carrier's ability to deliver Phase II information to PSAPs under the consent decree.

⁵ 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 in its licensed footprint from which it has received Phase I and Phase II requests. (T-Mobile automatically considers a request for Phase II information as incorporating a request for Phase I information.)

⁶ Note that in accordance with Paragraph 10(a) of the T-Mobile Consent Decree, for all pending Phase I and Phase II requests, T-Mobile has reported in **Attachment A** the date on which it received the particular request from the PSAP.

responsible and therefore the request is invalid under the Commission's Rules;⁷ or (b) has filed a certification with the FCC pursuant to the Richardson Recon Order.⁸ In some cases T-Mobile has not received all the documentation required under the Richardson Order⁹ to determine PSAP readiness, therefore these requests are marked as tolled per the Order. (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.

II. T-Mobile Location Technology Compliance

Paragraph 10(b)(1) of T-Mobile's 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. T-Mobile hereby reports that to date, the network-based location technology deployed for delivering E911 Phase II location information does meet the Commission's network-based accuracy requirements of 100 meters for 67 percent of calls and 300 meters for 95 percent of calls.

III. Cell Site Deployment and Activation Benchmarks

Paragraph 10(b)(2) of T-Mobile's consent decree also 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. As reported in its November 2004 Quarterly Report, T-Mobile has satisfied the relevant milestone ahead of schedule: deployment of 6,000 Location Measurement Units ("LMUs") by November 17, 2004. Further, as we also reported in our November report, T-Mobile has satisfied ahead of schedule the requirement to deploy 8,000 LMUs by February 17, 2005.

⁷ See 47 C.F.R. § 20.18(a).

⁸ *Petition of City of Richardson*, Order on Reconsideration, CC Docket No. 94-102, 17 FCC Rcd 24282 (2002) ("Richardson Recon Order").

⁹ *Petition of City of Richardson*, Order, CC Docket No. 94-102, 16 FCC Rcd 18982 (2001) ("Richardson Order").

IV. NSS/E-OTD

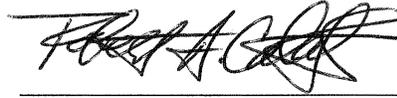
Pursuant to paragraph 10(b)(10) of T-Mobile's consent decree, T-Mobile confirms that it continues to provide NSS location information to PSAPs for all deployments that were receiving and utilizing such location information as of the Effective Date of the decree (the sole exception being those instances in which PSAPs have agreed to migrate from NSS as they transition to TDOA service).¹⁰ Further, T-Mobile has worked with each of the three PSAPs receiving E-OTD location information as of the Effective Date of the consent decree on a plan for the termination of the provision of E-OTD information and the transition to the provision of TDOA location information. Specifically, E-OTD has been de-commissioned in St. Clair, Illinois, Denton, Texas and the State of Rhode Island, and T-Mobile is providing TDOA location information to each of those PSAPs.

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 T-Mobile's 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.

¹⁰ For PSAPs already receiving Phase II TDOA service, NSS information is not being provided.

Please contact the undersigned should there be further questions.

Respectfully submitted,



Robert A. Calaff
Director – Federal Policy

Attachment

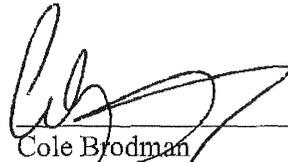
cc: David Solomon, Chief, Enforcement Bureau
John Muleta, Chief, Wireless Telecommunications Bureau
John Newman, Executive Director, APCO
Robert Gurss, Director of Legal and Government Affairs, APCO
Rob Martin, Executive Director, NENA
James R. Hobson, Counsel, NENA
Steve Marzolf, President, NASNA

Sheryl Wilkerson, Office of Chairman Powell
Jennifer Manner, Office of Commissioner Abernathy
Paul Margie, Office of Commissioner Copps
Sam Feder, Office of Commissioner Martin
Barry Ohlson, Office of Commissioner Adelstein
Catherine Seidel, Wireless Bureau
Nicole McGinnis, Wireless Bureau
Michael Wilhelm, Wireless Bureau
Patrick Forster, Wireless Bureau
Lisa Fowlkes, Enforcement Bureau
Katherine Berthot, Enforcement Bureau

DECLARATION OF COLE BRODMAN

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

Executed on February 1, 2005



Cole Brodman
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