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27519 - 108TH AVE. S.E. • KENT, WA 98030 • (253) 372-1300 • FAX (253) 372-1305

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

RECEIVED & INSPECTED

MAR 24 2005

FCC - MAILROOM

RE: WT Docket 94-102

Valley Communications Center is a police/fire/EMS combined emergency communications center that serves just under 700,000 population in South King County, WA. This issue is extremely important to our citizens and their communities as wireless technology is increasingly being relied on as the primary means of communication overall and more critically, during emergencies.

Valley Communications Center supports APCO International's filing on this matter, which included:

- FCC's declaratory ruling should reference Carriers must demonstrate compliance with the average accuracy levels specified in the FCC's rules.
- Too large a measurement area will leave some public safety answering points (PSAPs) with very poor levels of accuracy.
- Wireless 9-1-1 accuracy testing should be required at the local community level.
- Compliance testing should be conducted at the PSAP, county, or statistical area (MSA or RSA) level, not at the state or national level as some carriers suggest.
- It is important to require re-testing on a periodic basis, no less frequently than every two years.

A statewide or national accuracy test will not establish an enforceable level of accuracy in our service area. 9-1-1 systems are configured to meet the needs of citizens in an emergency services area and wireless 9-1-1 should be no different. If the wireline system is deployed for a specific area, the wireless system should be deployed for the same area, including enforceable accuracy standards.

The Commission should establish clear guidance regarding the relevant geographic area in which wireless carriers must provide and test E9-1-1 accuracy to the levels specified in the Commission's rules as outlined in APCO International's filing.

Sincerely,

Chris Fischer, Director of Communications

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