

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Verizon Wireless Request For Limited) WT Docket No. 05-301
Waiver of GPS Handset Penetration Rule)

REPLY COMMENTS OF VERIZON WIRELESS

Verizon Wireless hereby replies to comments on its October 17, 2005, Request for Limited Waiver of the 95% GPS handset penetration milestone date to allow it an additional six months to meet the milestone.¹ The record clearly warrants a grant of Verizon Wireless' request. All of the parties that filed comments expressly supported or did not oppose the six-month extension.

Verizon Wireless' request explained that the 95% penetration milestone is uniquely challenging because it depends on actions by customers to change out their handsets. To encourage customers to do so, Verizon Wireless introduced dozens of GPS-capable handsets at all price ranges, subsidized and advertised these handsets, engaged in multiple targeted marketing efforts, and provided customers with information about the benefits of GPS handsets on its website. More than 91% of Verizon Wireless' customers have GPS-capable handsets, and Verizon Wireless expects more

¹ On October 21, 2005, the Wireless Telecommunications Bureau released a Public Notice (DA 05-2760, DA 05-2671), setting dates for filing comments and reply comments on Verizon Wireless' request as well as on a separate request filed by Nextel Partners.

than 93% of its customers to have GPS-capable handsets by year-end. It has “come as close as possible” to meeting the 95% penetration milestone, has been on “a path to full compliance,” and has met or exceeded all other E-911 milestones.

Public Safety organizations and State Public Service Commissions noted Verizon Wireless’ commitment and efforts to meet the Commission’s E911 requirements. The National Emergency Number Association (“NENA”) stated, “Based on Verizon’s reported efforts and its near-achievement of the 95% threshold, NENA has no objection to a waiver that would extend the time for meeting the location-capable handset requirement to June 30, 2006, provided that quarterly reporting continues as offered by the carrier.”² The Association of Public Safety Communications Officials International (“APCO”) also acknowledged Verizon Wireless’ efforts: “Verizon Wireless appears to have made significant efforts to meet its E9-1-1 obligations, and those efforts should be given appropriate consideration in the Commission’s review of its waiver request.”

Two state public utility commissions also supported Verizon Wireless’ request. They acknowledged that, because consumers ultimately decide when to upgrade to GPS-capable technology, flexibility in the deadline is

² NENA Comments at 2. NENA did question the statistics behind Verizon Wireless’ statement that “only about one third of the nation’s PSAPs have deployed Phase II service.” By way of clarification, Verizon Wireless was referring to the percentage of PSAPs nationwide that had completely deployed Verizon Wireless’ Phase II E911 service. NENA’s statistics refer to the percentage of PSAPs that have “some” Phase II service, meaning service by any CMRS provider. Verizon Wireless appreciates NENA’s views, and pledges its continued commitment to working with NENA on this and other matters.

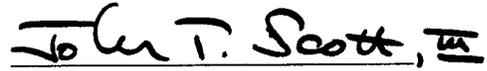
warranted. As the North Dakota Public Service Commission stated, “Technology, the passage of time and natural churn will take care of this issue without undue burdens placed on consumers. We urge the FCC to support reasonable efforts at flexibility with regard to the deadline. Verizon Wireless’ request meets this standard.”³ The South Dakota Public Utility Commission agreed: “Verizon Wireless states ‘it would be unprecedented and ill-advised for the Commission to demand strict compliance that would compel the company to force customers to swap out their handsets.’ The SDPUC agrees. The SDPUC continues to believe that a suspension of the deadline is in the best interests of consumers, and, therefore, supports Verizon Wireless’ request for a limited waiver.”⁴ The other two parties filing comments, CTIA and Centennial Communications Corp., concurred that Verizon Wireless’ petition met the requirements for a waiver and should be granted. They noted that Verizon Wireless demonstrated good cause for relief, had been diligent in its compliance efforts, and outlined a clear path to full compliance, and supported Verizon Wireless’ arguments as to why a limited waiver would serve the public interest.

The consensus of comments, together with the factual demonstrations in Verizon Wireless’ request, provide an ample record on which to grant the request. Verizon Wireless will continue its efforts to increase the percentage of its customers using GPS handsets. Verizon Wireless accordingly asks that

³ North Dakota Public Service Commission Comments at 2.

⁴ South Dakota Public Utilities Commission Comments at 1.

the Commission grant it an additional six months, until June 30, 2006, to achieve the 95% handset penetration milestone.

Handwritten signature of John T. Scott, III in black ink.

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