

John T. Scott, III  
Vice President &  
Deputy General Counsel  
Regulatory Law



Verizon Wireless  
1300 I Street, N.W.  
Suite 400 West  
Washington, DC 20005

Phone 202 589-3760  
Fax 202 589-3750  
john.scott@verizonwireless.com

October 4, 2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 – 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Certification of Non-Readiness pursuant to 47 C.F.R. § 20.18(j)(4)

Dear Ms. Dortch:

Verizon Wireless, having given prior notice to Elk County and Cameron County (“Counties”), local Public Safety Answering Point (“PSAP”) jurisdictions within the state of Pennsylvania, hereby files this certification letter pursuant to 47 C.F.R. § 20.18(j)(4) of the Commission’s rules.

Verizon Wireless is ready to perform testing to ensure the proper operation of the E911 systems it has deployed in the Counties, which is the precursor to the system going live and providing enhanced 911 capabilities to the residents of the Counties. However, the Counties have required additional testing procedures that are both unnecessary and burdensome. Verizon Wireless has agreed to provide some but not all of the additional testing. The remaining areas of disagreement are summarized below and in the attached letter notifying the Counties of the company’s intent to file a certification with the FCC.

Using widely accepted testing methods and procedures, Verizon Wireless has deployed with other PSAPs in Pennsylvania (and across the nation) within mandated or negotiated timeframes, sometimes before expiration of such deadlines. Verizon Wireless tests deployments in accordance with the ESIF High Level Requirements for End-to-End

Marlene H. Dortch  
October 3, 2006

Functional Testing (ATIS 0500006) and the NENA Wireless Phase I/II Planning and Implementation Checklist and Modules OID (57-502). Both of these documents were developed through a partnership of experienced Public Safety officials, Wireless Carriers and Emergency Services Network Providers and were designed to ensure that E911 services will function as required in an emergency.

The purpose of end-to-end functional testing is to check the translations in the switch for the different types of CDMA handsets (i.e: service initialized, uninitialized, roamer and prepaid), check voice and data connectivity from the wireless network to the Emergency Services network, ensure that the 911 call is routed to the appropriate PSAP and ensure that the PSAP gets the caller/location data without significant alteration or delay.

Since the translation for the different types of CDMA handsets is done at the switch, the handsets function in the same manner on all cell sites attached to that switch. Therefore, it is only technologically necessary to perform a System test of the different types of CDMA handsets once when the first PSAP is deployed on a given switch. By contrast, the Counties have required that Verizon Wireless perform a System test at each cell site within their PSAP jurisdiction, by placing calls from different types of CDMA handsets at one sector of every cell site being deployed with E911 Phase II service. In the spirit of compromise, and in order to ease concerns of public safety about the switch functionality for the various CDMA handsets, Verizon Wireless has agreed to perform the System test on the first cell site of each PSAP deployment, but not one sector of every cell site being deployed within the PSAP jurisdiction. In addition, Verizon Wireless has agreed during the Drive test phase of the deployment, to alternate between the different types of phones as we place one call at each cell sector for each deployment. This additional, non-standard testing agreed to by Verizon Wireless should more than satisfy all of the Counties' concerns with regard to the functioning of the various types of handsets at the cell site level. However, our efforts to compromise and the notice letter dated September 12, 2006 have not resulted in authorization from the Counties to complete the deployment. In addition, there were some unrelated PSAP readiness issues that unless resolved by the PSAPs with the local LEC, would otherwise prevent timely deployment.

Verizon Wireless has completed all of the steps necessary and stands ready to deploy E911 Phase II services. The only remaining obstacles to our deployment are: 1) PSAP readiness issues related to the LEC, and 2) the Counties' refusal to allow Verizon Wireless to perform any deployment testing unless we agree to the technologically

Marlene H. Dortch  
October 3, 2006

unnecessary and burdensome requirement that System testing be performed at every cell site within the PSAP jurisdiction. Verizon Wireless has been ready to deploy E911 Phase II service within the mandated 180 days and any delays, at this point, have been the result of PSAP readiness issues and testing demands.

Sincerely,



John T. Scott, III  
Vice President and Deputy General  
Counsel – Regulatory Law

cc: Berniece Jarbeck, Elk County Emergency Services & acting on behalf of  
Cameron County  
Jeff Cohen, Wireless Telecommunications Bureau  
Kathryn Berthot, Enforcement Bureau

Enclosure



Verizon Wireless  
One Verizon Place  
Alpharetta, GA 30004-8511

Phone 678 339-4000

September 12, 2006

Via Electronic Mail & Federal Express

Ms. Berniece Jarbeck  
Elk County Emergency Services  
Elk County Courthouse  
PO Box 448  
Ridgway, PA 15853-0448

Re: E911 Phase II Deployment Testing – Elk and Cameron Counties; Notice of Intent to File a Certification of Non-Readiness pursuant to 47 C.F.R. §20.18(j)(4)

Dear Ms. Jarbeck:

This letter is in response to your requirement that Verizon Wireless perform a System test at each cell site for both Elk and Cameron Counties (“Counties”) by placing calls from different types of CDMA handsets at one sector of every cell site being deployed with E911 Phase II service. Unless the current impasse regarding testing procedures can be resolved such that deployment can proceed, this letter also serves as Verizon Wireless’s notice to the Counties of its intent to file a Certification of Non-Readiness pursuant to the rules of the Federal Communications Commission (“FCC”) at 47 C.F.R. §20.18(j)(4). Hopefully this matter can be resolved without a need to actually file a certification with the FCC. Using widely accepted testing methods and procedures, Verizon Wireless has deployed with several PSAPs in Pennsylvania within mandated or negotiated timeframes, sometimes before expiration of such deadlines, and hopes to provide the benefits of E911 service to the Counties without further delay.

Verizon Wireless has always had a strong commitment to ensuring that E911 services are deployed properly and continue to function in a reliable and quality manner. For that reason, Verizon Wireless tests deployments in accordance with the ESIF High Level Requirements for End-to-End Functional Testing (ATIS 0500006) and the NENA Wireless Phase I/II Planning and Implementation Checklist and Modules OID (57-502). Both of these documents were developed through a partnership of experienced Public Safety officials, Wireless Carriers and Emergency Services Network Providers and were designed to ensure that E911 services will function as required in an emergency.

The purpose of end-to-end functional testing is to check the translations in the switch for the different types of CDMA handsets (i.e: service initialized, uninitialized, roamer and prepaid), the voice and data connectivity from the wireless network to the Emergency

Services network, ensure that the 911 call is routed to the appropriate PSAP and ensure that the PSAP gets the caller/location data without significant alteration or delay. Since the translation for the different types of CDMA handsets is done at the switch, the handsets function in the same manner on all cell sites attached to that switch. Therefore, it is only technologically necessary to perform a System test of the different types of CDMA handsets when the first PSAP is deployed on a given switch.

However, in order to ease concerns of public safety about the switch functionality for the various CDMA handsets, Verizon Wireless has agreed to perform the System test on the first cell site of each PSAP deployment. In addition, Verizon Wireless has agreed during the Drive test phase of the deployment, to alternate between the different types of phones as we place one call at each cell sector. This additional, non-standard testing agreed to by Verizon Wireless should more than satisfy all of the Counties' concerns with regard to the functioning of the various types of handsets at the cell site level.

At this time, Verizon Wireless has completed all of the steps necessary and stands ready to deploy E911 Phase II services so that the citizens of Elk and Cameron County may benefit from enhanced 911 services. The only remaining obstacles to our deployment are: 1) PSAP readiness issues related to Emergency Service Provider-Alltel and 2) the Counties' refusal to allow Verizon Wireless to perform any deployment testing unless we agree to the technologically unnecessary and burdensome requirement that System testing be performed at every cell site. This additional testing wastes the limited resources of wireless carriers that are spread over numerous deployments across the country. The Counties are free to conduct on their own, any additional testing they deem necessary after the E911 Phase II service deployment.

Verizon Wireless has been ready to deploy E911 Phase II service within the mandated 180 days and any delays, at this point, have been the result of PSAP readiness issues and testing demands. Verizon Wireless is requesting that once the PSAP readiness issues are resolved, that we be allowed to conduct deployment testing in accordance with accepted and time-tested industry standards.

Sincerely,

A handwritten signature in cursive script that reads "Susan J. Sherwood". The signature is written in black ink and is positioned above the typed name.

Susan J. Sherwood  
Verizon Wireless  
Manager E911