



Texas 9-1-1 Alliance

100 East 15th St., Suite 420
Fort Worth, TX 76102
www.texas911alliance.org



Ex Parte

March 10, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Wireless E911 Location Accuracy Requirements (PS Docket No. 07-114);
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911
Emergency Calling Systems (CC Docket No. 94-102); and
911 Requirements for IP-Enabled Service Providers (WC Docket No. 05-196)**

Dear Ms. Dortch,

The Texas 9-1-1 Alliance files this ex parte comment respectfully urging the Commission to consider and resolve certain outstanding Part III.B issues consistent with the Texas 9-1-1 Alliance's prior comments in these dockets. Expedited consideration and resolution of these issues now are overwhelmingly supported by the current record and public safety. Specifically, the Texas 9-1-1 Alliance urges the following key points:

- (1) At this time the Commission should not adopt a single location accuracy standard for Interconnected VoIP under 47 CFR Section 9.5 and Commercial Mobile Radio Services ("CMRS") under 47 CFR Section 20.18 as proposed in paragraph 18 of the NPRM. A wireless carrier offering Interconnected VoIP or local voice services via a wired broadband connection to other than only wireless handsets (e.g., T-Mobile Talk Forever service [see attached article]) must at minimum comply with the 47 CFR Section 9.5 Interconnected VoIP 9-1-1 "registered location" requirements and 9-1-1 routing requirements. The current record in these dockets overwhelmingly supports the greater accuracy and public safety reliability of providing "registered location" addresses rather than only wireless latitude and longitude for an identifiable address location to which emergency services can be dispatched, such as from a consumer's home phone service; and such calls should be routed to the wireline PSAP serving the home location

The Texas 9-1-1 Alliance is an interlocal cooperation act entity composed of the Texas Health and Safety Code Chapter 772 Emergency Communication Districts with E9-1-1 service public safety responsibility for approximately 50% of the population of Texas. The Texas 9-1-1 Alliance members joining in these comments are: Abilene/Taylor County 9-1-1 District, Austin County Emergency Communications District, Bexar Metro 9-1-1 Network District, Brazos County Emergency Communication District, Calhoun County 9-1-1 Emergency Communication District, Cameron County Emergency Communications District, 9-1-1 Network of East Texas, Denco Area 9-1-1 District, Emergency Communications District of Ector County, Galveston County Emergency Communication District, Greater Harris County 9-1-1 Emergency Network, Henderson County 9-1-1 Communication District, Howard County 9-1-1 Communication District, Kerr Emergency 9-1-1 Network, Lubbock Emergency Communication District, McLennan County 9-1-1 Emergency Assistance District, Midland Emergency Communications District, Montgomery County Emergency Communication District, Potter-Randall County Emergency Communications District, Smith County 9-1-1 Communications District, Tarrant County 9-1-1 District, Texas Eastern 9-1-1 Network, and Wichita-Wilbarger 9-1-1 District.

consistent with the Interconnected VoIP 9-1-1 requirements in 47 CFR Section 9.5 when it is different from the wireless PSAP or CMRS towers serving such home location.¹

- (2) The Texas 9-1-1 Alliance understands that in the T-Mobile Talk Forever service already deployed in the Dallas, Texas area, 9-1-1 emergency calls provide both the “registered location” of the home consumer and the latitude and longitude of the location. The T-Mobile Talk Forever service for home locations further demonstrates the compelling need for the Commission’s expedited clarification of item 1 above as the services are now capable of generating live 9-1-1 calls in the Dallas, Texas metropolitan area and because such services are expected to expand or be offered by other wireless carriers in the near future. As explained in Commissioner Tate’s and Commissioner McDowell’s separate statements, the increased abandonment/replacement of traditional wireline services is a significant part of the problem the Commission was attempting to reasonably address in the Part III.A PSAP level location accuracy order,² and the addition of “registered location” information may be a significant further step toward addressing improvements to 9-1-1 location accuracy from such home location services.
- (3) The Commission should also seek further prompt industry, public safety, and, pursuant to paragraph 19 of the NPRM, Commission Engineers and Staff input on whether and to what extent providing a “registered location” for all handsets being used via a wired broadband connection would help address in-building location accuracy and would also help address shortcomings of current wireless-only location technologies.
- (4) The Commission should also seek further prompt industry, public safety and, pursuant to paragraph 19 of the NPRM, Commission Engineers and Staff input on how wireless carriers providing “registered location” information from home location services via a broadband at home connection should be considered for purposes of wireless location accuracy testing and accuracy requirements.

¹ See, Joint Reply Comments of the Texas 9-1-1 Alliance and the Texas Commission on State Emergency Communications, filed September 18, 2007 at pp. 1-5. See also, Comments of Intrado, filed August 20, 2007, at p. 7, which explained:

As the use of end devices and associated technologies becomes more indistinguishable as between fixed and mobile environments, there is an increasing and urgent need to determine an approach that provides first responders with the most appropriate information to locate the end-user trying to reach emergency assistance. To that end, Intrado believes that, whenever possible a “dispatchable” street address is the most suitable location information to enable rapid and efficient emergency response. When address can correspond to a location, address information is preferred over geographic coordinates.

² See Statement of Commissioner Deborah Taylor Tate: “Moreover, even when the subscriber is not mobile, the mobile phone often is the preferred means of communication. One of every eight homes in this country is “wireless only,” so even at home people call 911 wirelessly. The ability to locate callers who are unable to describe their location, or unaware of their location, is critical to ensuring a timely, and potentially life-saving, response by public safety officials.” See also Statement of Commissioner Robert M. McDowell: “We all agree that wireless E911 service must satisfy the needs of public safety personnel, as well as the expectations of America’s wireless consumers. This is especially important because the percentage of Americans living in cellphone-only households recently reached 14 percent, overtaking for the first time the percentage in landline-only households, which stands at 12.3 percent.”

Again, the Texas 9-1-1 Alliance respectfully urges the Commission to consider and resolve on an expeditious basis the key points discussed above. Please direct any questions on this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W. H. Buchhertz', with a long, sweeping horizontal stroke extending to the right.

W. H. Buchhertz
Chairman

T-Mobile USA offers landline over Hotspot@Home

By admin

Created Feb 21 2008 - 7:59am

While T-Mobile is part of a group of operators embarking on a price war on the mobile voice side [1], the operator also upped the ante on its HotSpot@Home offering, rolling out Talk Forever Home Service in Seattle and Dallas for \$10 per line per month for unlimited domestic calls. The router costs \$49 and the service requires a broadband connection.

The new service runs on top of T-Mobile's existing HotSpot@Home offering, which enables converged WiFi and mobile-phone calling using one of four handset models that T-Mobile offers. Pricing was recently lowered for this service to \$10 per month for unlimited domestic calling for up to four cell phones. Both HotSpot@Home and Talk Forever Home require a minimum \$40 per month voice calling plan.

In an interview with *Wi-Fi Net News*, Joe Sims, vice president and general manager of T-Mobile's broadband products, said T-Mobile is looking to "address the remaining reasons people were reluctant to cut the cord."

To find out more about T-Mobile's new Talk Forever Home Service plan:

- read this piece [2] from *Wi-Fi Net News*

- see these images [3] of the Talk Forever router and phone

Related articles:

T-Mobile may extend VoIP with Hotspot@Home Report [4]

T-Mobile introduces unlimited calling over Wi-Fi Report [5]

Source URL:

<http://www.fiercewireless.com/story/T-Mobile-usa-offers-landline-over-hotspotat-home/2008-02-21>

Links:

[1] <http://www.fiercewireless.com/story/att-T-Mobile-match-vzw-on-flat-rate-sort-of/2008-02-20>

[2] <http://wifinetnews.com/archives/008192.html>

[3] <http://www.fiercewireless.com/slideshow/new-T-Mobile-talk-forever-plan?img=0>

[4] http://www.fiercewireless.com/story/T-Mobile-may-extend-voip-hotspot-home/2007-08-13-0?utm_medium=nl&utm_source=internal

[5] http://www.fiercewireless.com/press-releases/press-release-T-Mobile-introduces-unlimited-calling-over-wi-fi-national-launch-t-mobi?utm_medium=nl&utm_source=internal