

National Emergency Number Association
The Voice of 9-1-1



August 12, 2008

Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Verizon Wireless/Alltel Corporation Transfer of Control Applications,
WT Docket No. 08-95, ex parte communication
Pursuant to Section 1.1206 of the Rules

Dear Chairman Martin:

The National Emergency Number Association (NENA) files this letter concerning the pending transaction between Verizon Wireless and Alltel Wireless. As with many transactions requiring FCC approval, the Commission must address a myriad of issues. NENA can only address one important issue, which is hopefully a consideration of the Commission with any proposed transaction between telecommunications companies; the 9-1-1 performance of the companies involved.

By all accounts, Verizon Wireless has been a good corporate “9-1-1 citizen” over the years. Verizon Wireless has been a consistent leader in promoting public safety through the provision of wireless enhanced 9-1-1 (E9-1-1). The company has devoted substantial resources and personnel to develop, test, and implement nationwide AGPS/AFLT (Assisted Global Positioning System/Advanced Forward Link Trilateration) for its CDMA network and working with public safety in a variety of meetings over the years to address public safety concerns on E9-1-1 deployment, testing, and efforts to educate public safety about how to better utilize 9-1-1 information arriving at the public safety answering point. According to Verizon Wireless, to date, the company has deployed Phase I wireless E9-1-1 to 3,756 PSAPs in 1,689 counties in 49 states and the District of Columbia and Phase II wireless E9-1-1 to 3,314 PSAPs in 1,531 counties in 49 states and the District of Columbia.

Verizon Wireless has fulfilled its commitment to test and timely deploy the network upgrades necessary for wireless E9-1-1 and successfully met numerous FCC handset penetration benchmarks. For example, the company met the following milestones for new handset activations without delay: twenty-five percent of new activations by July 31, 2002, fifty percent of new activations by March 31, 2003, and one hundred percent of new activations by December 31, 2003. While the company did not meet the 95% handset penetration deadline by December 31, 2005,¹ Verizon Wireless achieved this benchmark earlier than most other major carriers by May of 2006, without FCC intervention or sanction.

In addition to providing effective wireless E9-1-1 service, NENA is aware of several instances in which Verizon Wireless demonstrated good corporate citizenship to help callers in

¹ No wireless carrier successfully met the 12/31/05 deadline.

need and to assist Public Safety Answering Points (PSAPs). Some examples include the following: tracking down calls from cell phones making illegitimate bomb threats in Philadelphia; providing records in a criminal prosecution for sexual assault and domestic violence which demonstrated that the victim had made a 9-1-1 call for help; providing information that helped a PSAP locate a caller in an auto accident; helping to narrow the search area for an escaped prisoner using a cell phone during his get away in a stolen vehicle in Delaware; helping to locate New York gang members in Virginia for the U.S. Marshals Service; and providing assistance to locate a man who was carjacked, kidnapped and robbed by a woman at gunpoint in Ocala, Florida.

For the aforementioned reasons, we encourage the Commission to take into consideration the substantial efforts made by Verizon Wireless to deploy effective, life-saving, nation-wide E9-1-1 service as a factor in the pending Verizon Wireless/Alltel Wireless transaction. The merger will enable Verizon Wireless to expand their proven commitment to public safety and specifically E9-1-1 to many parts of the country including rural areas that would particularly benefit from Verizon Wireless's commitment.

Thank you for consideration of this matter.

Sincerely,

A handwritten signature in cursive script, reading "Brian L. Fontes".

Brian Fontes
CEO

cc: Honorable Michael Copps
Honorable Jonathan Adelstein
Honorable Deborah Taylor Tate
Honorable Robert McDowell