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July 17, 2009

Ms. Kris Monteith– Chief of Enforcement Bureau
Mr. Jim Schlichting – Acting Chief of the Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: E911 Compliance Issue, CC Docket No. 94-102

Dear Ms. Monteith and Mr. Schlichting:

AT&T Mobility LLC (hereinafter “AT&T”) is operating under two E911 GSM Consent Decrees with the Commission. The first was entered into by former AT&T Wireless Services, Inc., dated October 9, 2002 (the “AWS CD”), and the second by former Cingular Wireless LLC, dated June 6, 2003 (the “Cingular CD”). Both Consent Decrees require AT&T to provide the Commission with notice of unexpected problems affecting AT&T’s ability to perform any of the deployment benchmarks established in the decrees.¹ AT&T hereby notifies the Commission of difficulties it experienced in meeting AWS CD benchmark 9(a)(8) and Cingular CD benchmark 8(a)(9).

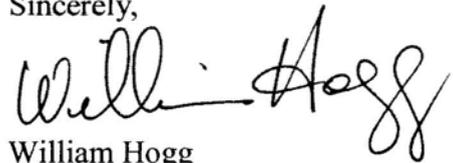
AT&T received a Phase I request for E911 service from the Santa Fe Regional Emergency Communications Center, NM (“Santa Fe County”) on July 21, 2004 and a Phase II request on October 10, 2005. It also received a simultaneous Phase I and II request for service from San Miguel County Sheriff, NM (“San Miguel County”) on January 22, 2008. These deployments were identified in AT&T’s FCC E911 Quarterly Reports as having been fully deployed prior to the applicable deadlines. On June 17 2009, Santa Fe County notified AT&T that it had received some 911 calls via its 10 digit dialable emergency number. AT&T immediately investigated the issue and discovered that two sites located in San Miguel County were in fact delivering 911 calls via the 10 digit dialable emergency lines. The two sites provide wireless service to Santa Fe County, and San Miguel County. While Phase I and II capabilities had been deployed in these sectors, these routing errors precluded the provision of Phase I and II data to the PSAPs. Upon further investigation, AT&T determined that this routing error had been in place at the time the FCC deployment deadlines occurred.

¹ AWS CD §13 and Cingular CD §12

The PSAPs were notified of the situation on June 17, 2009. The routing error was corrected and Phase I and II fully tested through to both PSAPs on June 19, 2009. AT&T is currently in the process of re-verifying the routing of all of its other sites in San Miguel and Santa Fe Counties with the proper state and local authorities to assure that each site is providing compliant E911 service.

Should you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "William Hogg". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

William Hogg

cc: David Furth – Acting Chief of the Public Safety and Homeland Security Bureau
Jeff Cohen - Acting Deputy Bureau Chief
Carol Simpson - Acting Associate Bureau Chief
Erica Olsen – Special Counsel