



August 18, 2010

*Electronic Filing*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, D.C. 20554

Re: CC Docket No. 94-102, WT 03-76.

Dear Ms. Dortch:

Attached you will find a Certification pursuant to Section 20.18(j)(4) of the Commission's rules regarding a request by the St Pauls Police Department for Phase II E-9-1-1 service.

Sincerely,

/s/ Kathleen O'Brien Ham

Kathleen O'Brien Ham  
Vice President,  
Federal Regulatory Affairs

CC: Thomas J. Beers; David Siehl; R. Thomas Hagens, Chief of Police, St. Pauls Police Department, 210 West Blue Street, St. Pauls, NC 28384

## CERTIFICATION OF St Pauls Police Department

I, Kathleen Ham, certify:

1. This certification is made on behalf of T-Mobile USA, Inc. ("T-Mobile") under Section 20.18(j)(4) of the Commission's rules, 47 C.F.R. § 20.18(j)(4).
2. I, Kathleen Ham, am an officer of T-Mobile USA, Inc., serving as the Vice President of Federal Regulatory Affairs for T-Mobile. I am responsible for T-Mobile's compliance with FCC Regulations, including E9-1-1 requirements, have general knowledge of T-Mobile's deployment of E9-1-1 service, and have been provided the facts stated herein by T-Mobile's E9-1-1 deployment staff, which I believe to be correct. To the extent this certification discusses E9-1-1 deployment on the Public Safety Answer Point's ("PSAP") side of the demarcation point, those portions of this certification are based on T-Mobile's best understanding of those facts and circumstances, which is based largely on the representations of the PSAP and/or its Local Exchange Carrier ("LEC").
3. T-Mobile USA received a request letter for Phase II E9-1-1 service for the St Pauls Police Department in Robeson County, NC, on February 18, 2010. The Phase II deployment due date for the St Pauls Police Department is set at August 17, 2010; however, required steps to complete the deployment by this date have not been completed by the PSAP.
4. To the best of my knowledge, the PSAP known as St Pauls Police Department is currently not able to receive and utilize Phase II E9-1-1 data elements from T-Mobile USA due to the **lack of a shell record which is required to obtain the ESRK range for routing 9-1-1 calls**. Further implementation efforts cannot be made until the PSAP becomes ready to test the capability to receive and utilize the data elements associated with the E9-1-1 service requested from T-Mobile.
5. According to its records, T-Mobile initially contacted the St Pauls Police Department via phone on February 19, 2010 to obtain the necessary deployment information since the T-Mobile sites that will route Phase II service to the St Pauls Police Department are currently routing Phase II service to Robeson County Communications. T-Mobile contacted the St Pauls Police Department on March 9, 2010, to request the required shell record information. T-Mobile contacted the PSAP again on March 18, 2010, March 22, 2010, April 5, 2010, May 3, 2010, May 17, 2010, June 1, 2010, June 14, 2010, July 6, 2010, and July 12, 2010, requesting that the PSAP provide T-Mobile with the shell record information for the PSAP's E9-1-1 calls. The PSAP has not provided T-Mobile with the requested shell record information to date.
6. Without the shell record information, T-Mobile cannot: complete and send the data file to the ALI database provider, perform Mobile Switching Center and Gateway Mobile Location Center data translations, or test the requested service. Until the PSAP provides shell record information to T-Mobile so that T-Mobile can complete these steps, T-Mobile will not be able to transmit E9-1-1 data elements to the proper nodes within the

area covered by St Pauls Police Department's request, and the St Pauls Police Department will therefore not be able to receive and utilize E9-1-1 data elements.

7. Listed in Attachment "A," hereto are the specific steps T-Mobile has taken to provide the requested service to the St Pauls Police Department, and the specific steps that remain to be completed by T-Mobile. "Yes" means T-Mobile has completed that step. "Incapable" means T-Mobile cannot complete that step until the PSAP or LEC completes certain prerequisite steps, as described above. "N/A" means that the specific step is not applicable to the requested service in this instance since Phase I & II service is already in place for the two sites currently routing to Robeson County Communications. T-Mobile has completed all necessary steps that it can complete towards E9-1-1 implementation without the PSAP providing the necessary shell record information and being ready to receive and utilize the E9-1-1 information to be provided by T-Mobile.
8. Listed in Attachment "B," hereto are the specific steps that remain to be completed by the PSAP or other parties before T-Mobile can provide the E9-1-1 service requested. "Yes" means that, to the best of T-Mobile's understanding, the PSAP has completed that step. "No" means that, to the best of T-Mobile's understanding, the PSAP or other responsible party, has not completed that step. "N/A" means that the step is not applicable to the requested service in this instance. "Unknown" means that T-Mobile does not have sufficient knowledge to make any determination regarding the status of that step.

I certify under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of August, 2010, by:



Kathleen O. Ham, Vice President, Federal Regulatory Affairs

**ATTACHMENT A to Certification of T-Mobile USA, Inc.  
with respect to the Request of the  
St Pauls Police Department (NC)  
Steps taken by T-Mobile toward E9-1-1 Implementation for the  
St Pauls Police Department (NC)**

- |   |                                    |   |   |
|---|------------------------------------|---|---|
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Incapable | <input type="checkbox"/> N/A            | Built, tested, and integrated the Gateway Mobile Location Center ("GMLC") into T-Mobile's network                 |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Incapable | <input type="checkbox"/> N/A            | Built, tested, and integrated the Serving Mobile Location Center ("SMLC") into T-Mobile's network (Phase II only) |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Incapable | <input type="checkbox"/> N/A            | Built, tested, and integrated Location Measurement Unit(s) ("LMU") (Phase II, TDOA only)                          |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Incapable | <input type="checkbox"/> N/A            | Upgraded, tested, and patched software in Mobile Switching Center(s) ("MSC")                                      |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Incapable | <input type="checkbox"/> N/A            | Upgraded, tested, and patched software in Base Station Controller(s)  |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Incapable | <input type="checkbox"/> N/A            | Requested selective router location (CLLI codes) from the PSAP or obtained location from an alternate source      |
| <input type="checkbox"/> Yes            | <input type="checkbox"/> Incapable | <input checked="" type="checkbox"/> N/A | Sent coverage map(s) to the PSAP  |
| <input type="checkbox"/> Yes            | <input type="checkbox"/> Incapable | <input checked="" type="checkbox"/> N/A | Sent data file(s) to the PSAP   |
| <input type="checkbox"/> Yes            | <input type="checkbox"/> Incapable | <input checked="" type="checkbox"/> N/A | Requested routing instructions from the PSAP  |
| <input type="checkbox"/> Yes            | <input type="checkbox"/> Incapable | <input checked="" type="checkbox"/> N/A | Prepared network design diagram   |
| <input type="checkbox"/> Yes            | <input type="checkbox"/> Incapable | <input checked="" type="checkbox"/> N/A | Performed trunk sizing ( <i>i.e.</i> , determined the number of trunks required)                                  |
| <input type="checkbox"/> Yes            | <input type="checkbox"/> Incapable | <input checked="" type="checkbox"/> N/A | Completed forms and exhibits for ordering trunks from LEC   |
| <input type="checkbox"/> Yes            | <input type="checkbox"/> Incapable | <input checked="" type="checkbox"/> N/A | Obtained PSAP authorization to order trunks, if applicable  |
| <input type="checkbox"/> Yes            | <input type="checkbox"/> Incapable | <input checked="" type="checkbox"/> N/A | Ordered trunk(s) from LEC   |

**ATTACHMENT A**

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with respect to the Request of the  
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St Pauls Police Department (NC)**

- |   |  |
|---|--|
| <input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A | Ordered transport from LEC, if applicable  |
| <input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A | Tested trunks  |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Requested pANI assignment from LEC or obtained from an alternate source  |
| <input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A | Completed data file for delivery to PSAP   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Completed date file for delivery to ALI database provider  |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Sent data file to ALI database provider  |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Performed MSC data translation (script allowing routing of E9-1-1 voice to correct PSAP and identification of the receiving tower) |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Performed GMLC data translation (script allowing routing of E9-1-1 data to correct PSAP and identification of the receiving tower) |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Scheduled testing with PSAP  |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Performed profile test   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Performed field test   |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Reconciled field test  |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Performed retest, if applicable  |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A | Accepted testing (provisioning complete)   |

**ATTACHMENT A**

**ATTACHMENT B to Certification of T-Mobile USA, Inc.  
with respect to the Request of the  
St Pauls Police Department (NC)  
Actions Required By the PSAP or Other Parties  
Before T-Mobile Can Complete E9-1-1 Implementation**

- |   |   |
|---|---|
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown | Requested service from LEC (PSAP)   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Unknown | Sent selective router location (CLLI codes) to T-Mobile (PSAP)  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Unknown | Sent routing instructions to T-Mobile (PSAP)  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown | Upgraded Customer Premises Equipment ("CPE") (including Computer Aided Dispatch ("CAD"), Geographic Information System ("GIS"), and 10-digit capability) (PSAP) |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown | Built Master Street Address Guide ("MSAG") (PSAP)   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown | Completed data file upload (LEC)  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown | Upgraded ALI database, if applicable (LEC)  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown | Upgraded selective router, if applicable (LEC)  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown | Provisioned trunks for T-Mobile (LEC)   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown | Provisioned or upgraded trunks for PSAP (from Phase zero to Phase I or II), if applicable (LEC)   |