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In North Carolina

In the Matter of)
)
Wireless Telecommunications Bureau)
Seeks Comment On Report) WT Docket No. 02-46
On Technical and Operational)
Wireless E911 Issues)

COMMENT

Comment Date: November 5, 2002

Regarding principal issues and concerns raised during the course of the inquiry:

1. Mr. Hatfield recommends that a “National 911 Program Office” be established within the proposed Department of Homeland Security to coordinate with local and state public safety first responders and other stakeholders.
2. Because of the importance of E911 to the safety of life and property and to homeland security, Mr. Hatfield recommends that the Commission maintain or even increase its oversight of the rollout of wireless E911 services in the U.S. over the next several years.
3. Mr. Hatfield recommends that the Commission:
 - establish an advisory committee to address the technical framework for the further development and evolution of E911 systems and services including technical standards;
 - continue to urge the creation of organizations at the state, regional, and local levels of governments to coordinate the rollout of wireless E911 services; and
 - encourage the creation of a national level clearinghouse to collect, store, and disseminate status information on the rollout of wireless E911.
4. Mr. Hatfield recommends that the Commission actively coordinate with and support the U.S. Department of Transportation’s Wireless E911 initiative and other efforts to educate state and local governments and PSAPs on the benefits and importance of wireless E911 services.

5. He also recommends that the Commission continue to support the efforts of the Emergency Services Interconnection Forum (ESIF) to address the issue of PSAP readiness.
6. Mr. Hatfield recommends that the Commission work closely with individual and state regulatory commissions and their association, the National Association of Regulatory Utility Commissioners (NARUC), in resolving issues relating to LEC cost recovery and pricing.
7. In addition, Mr. Hatfield recommends that the Commission urge stakeholders to develop industry-wide procedures for testing and certification of wireless E911 to ensure that they meet the accuracy requirements specified in the Commission's rules.
8. Finally, Mr. Hatfield makes recommendations about several other issues, including the need for end-to-end testing of wireless E911 systems, conveying confidence/uncertainty information associated with position determination and routing choices, accommodating new requirements and requirement "creep", the impact of future technological developments, consumer expectations, the implications of commercial location-based services, and the need for an adaptable regulatory approach.

General Comments

There are two existing organizations that specifically should be addressing the 911/telephone/wireless issues of the public through and for local governments. These two organizations are; the National Association of Telecommunications Officers and Advisors (NATOA), and the National Emergency Number Association (NENA). The fact that the current wireless state of affairs exists has to raise the question why are these two organizations not prudent, and active on their acknowledged charters and areas of interest. For the Commission to designate or organize a third organization would appear to be redundant, wasteful and confusing to say the least. The better course of action should be for the Commission to do what is required to stimulate, support, and "charge" these two organizations to "pick-up the gauntlet", maybe in like form to how the Commission has setup and designated the land mobile frequency coordination. Perhaps a national fee going to these two organizations would help the user member have the resource to perform instead of being at the whim of membership fees or expenses from their local jurisdictions.

Let the Commission not be redundant and financially wasteful!

Specific Comments

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|---------|---|
| Ref. #1 | No! There are already too many "nations" in this area. For an example APCO, PSWN, etc. |
| Ref. #2 | I agree. |
| Ref. #3 | No! This already exists in NENA and the NENA vendors group. It just needs to be activated, stimulated and the movers and shakers need to be the users, <u>not</u> the vendor personnel. |

- Ref. #4 Don't they already know? 911 has been around for a long period of time. These people are already aware and sold on the awareness, need and benefit.
- Ref. #5 What is the ESIF? It needs to be publicized. No comment.
- Ref. #6 Isn't this already been done? If not, why not and why is this an issue?
- Ref. #7 This is already in OET 71, as a reference, why is this an issue?
- Ref. #8 Isn't this already being covered in NFPA 1221 (2002) and the NENA charter?
What is the new issue here?

Sincerely,



Frederick G. Griffin, P.E.
President

FGG/cft