

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Inquiry on Technical and) WT Docket No. 02-46
Operational Wireless E911 Issues)

COMMENTS OF AT&T WIRELESS SERVICES, INC.

Pursuant to the Wireless Telecommunications Bureau's Public Notice,^{1/} released October 16, 2002, AT&T Wireless Services, Inc. ("AWS") hereby respectfully submits its initial comments on the "Report on Technical and Operational Issues Impacting the Provision of Wireless Enhanced 911 Services" ("Hatfield Report" or "Report") prepared by Dale N. Hatfield.^{2/}

AWS fully agrees with the Hatfield Report's finding that accurate position reporting for wireless 911 calls is becoming more and more critical, both in the context of national security and for handling conventional emergencies. As the Report emphasizes, AWS and the other "wireless carriers that are subject to the Commission's rules are working to rollout E911 Phase II service pursuant to the deadlines established by Commission order."^{3/} Nevertheless, the overarching conclusion that can be drawn from the Report is that there has been insufficient appreciation on the part of all stakeholders that the deployment of wireless E911 has been, and continues to be, a uniquely complex endeavor involving potentially thousands of entities: local, state, and federal agencies and Public Safety Answering Points ("PSAPs") representing police, fire, and medical services, commercial mobile radio service ("CMRS") providers, incumbent local exchange carriers ("ILECs"), competitive local exchange carriers, automatic location

^{1/} Public Notice, *Wireless Telecommunications Bureau Seeks Comment on Report on Technical and Operational Wireless E911 Issues*, DA 01-2666, WT Docket No. 02-46 (rel. Oct. 16, 2002).

^{2/} Dale N. Hatfield, *A Report on Technical and Operational Issues Impacting The Provision of Wireless Enhanced 911 Services* (rel. Oct. 15, 2002).

information (“ALI”) vendors, equipment suppliers, third party E911 providers, handset manufacturers, system integrators, and consultants and advisors.^{4/}

Because wireless carriers are but one (albeit important) component of E911 implementation, increased regulation of the wireless industry would do nothing to further the Commission’s goals. Indeed, virtually all of the E911 compliance burden currently falls on CMRS providers, yet many of the problems and obstacles to E911 deployment cited in the Hatfield Report are completely beyond the control of wireless carriers. Accordingly, while remaining vigilant to the obligations of CMRS providers, the Commission should now turn its focus to the issues that continue to impede implementation of E911 service across the country.

First, it is essential that the Commission better define the responsibilities of all parties involved in the deployment and provision of Phase II E911 service and, most importantly, the vital role played by ILECs.^{5/} The Hatfield Report explains that ILECs essentially stand between wireless carriers and the PSAPs, controlling the Selective Routers, ALI databases, trunks, and other facilities necessary to deliver the wireless 911 call, callback number, and location

^{3/} Hatfield Report at 28.

^{4/} *Id.* at 18. In addition to the complexities caused by the number of entities necessarily involved in E911 deployment, the Hatfield Report explains that implementing wireless E911 is made considerably more difficult by the different technologies, air interfaces, spectrum assignments, and network architecture used by the U.S. wireless carriers. Moreover, at the same time that wireless carriers are implementing E911 systems, their networks are evolving as they progress from first generation to third generation technologies. CMRS providers also are in the process of upgrading their networks to support number portability and number pooling, which must be configured to permit nationwide roaming and to avoid disruptions to 911 traffic. These domestic network changes are further complicated as increasingly global wireless carriers incorporate international standards and processes into their systems. *Id.* at 31-33.

^{5/} As the Hatfield Report notes, “for a successful rollout to occur, all three of the major players in the delivery must be ready: the wireless carrier, the wireline E911 service provider (typically the ILEC), and the requesting PSAP.” *Id.* at 28.

information to the PSAP.^{6/} Notwithstanding this central role, as the Report points out, there has been inadequate attention paid to wireline technical issues, timing of upgrades, operational matters, and how ILECs intend to recover their E911 costs.^{7/} In large part because of questionable and possibly unjustified ILEC costs, PSAPs in many markets are withdrawing or suspending their Phase II requests and scaling back their E911 plans.^{8/} If widespread Phase II E911 deployment is to be achieved in a reasonable timeframe, the Commission will have to address the ILEC cost recovery and readiness issues immediately.

Second, although standards processes, such as the Emergency Services Interconnection Forum (ESIF), are very useful, and their continued involvement should be encouraged, the Commission should take steps to ensure that the responsibilities of standards-setting bodies are clarified and that there is better specification of E911 implementation standards. For example, there currently is no industry consensus on the issue raised in the Hatfield Report regarding potential delivery of “location reliability” information, which means that there is little understanding on how to interpret this information and the degree to which PSAPs should rely on it.^{9/} Nevertheless, individual jurisdictions are making independent decisions on whether such confidence and uncertainty factors should be delivered to PSAPs. Rather than permit ad hoc jurisdiction-by-jurisdiction negotiations on this issue, as well as a myriad of other E911 implementation matters, the Commission should facilitate further study and consensus on an industry-wide basis.

^{6/} *Id.* at 32.

^{7/} *Id.* at 33.

^{8/} *See, e.g., Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, AT&T Wireless Services, Inc. Quarterly Report (filed Nov. 1, 2002).

^{9/} Hatfield Report at 38-39.

Finally, any actions taken by the Commission on the Hatfield Report findings and recommendations should take into account the hundreds of millions of dollars already invested by wireless carriers in responding to PSAP Phase II requests and satisfying the Commission's current requirements. Although, as described in the Report, this investment has been made in an environment characterized by a lack of clearly defined responsibilities and standards and an abundance of complexity, neither the Commission nor any stakeholder can start from a clean slate. Rather, the Commission's focus at this point should be on facilitating the deployment of E911 service by "avoid[ing] the addition of new requirements at this critical stage of the rollout" and encouraging coalescence around industry-wide standards.^{10/} In addition, to prevent unnecessary delays while the Commission and the various stakeholders attempt to resolve the problems raised in the Hatfield Report, the Commission should insist that all parties continue to work diligently and cooperatively toward widespread implementation of E911 systems and service.

^{10/} *Id.* at 40.

CONCLUSION

For the foregoing reasons, AWS urges the Commission to broaden the focus of its E911 implementation efforts to address ILEC readiness and increased coordination on the development of industry standards.

Respectfully submitted,

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I, Bryan T. Bookhard, hereby certify that on this 15th day of November 2002, I caused copies of the foregoing "Comments of AT&T Wireless Services, Inc." to be sent to the following via e-mail:

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