

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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

**COMMENTS OF NOKIA**

Nokia Inc. (“Nokia”) hereby submits its comments on the *Report on Technical and Operational Issues Impacting The Provision of Wireless Enhanced 911 Services* prepared by Dale N. Hatfield.<sup>1</sup> Nokia appreciates the Commission’s inquiry into the technical and operational issues that affect deployment of wireless Enhanced 911 (E911) services. The resulting report provides an unbiased, expert opinion on the issues surrounding wireless E911 services. As a manufacturer of wireless equipment that employs E911 technologies, Nokia is hopeful that the Hatfield Report and the public comments filed in this proceeding will provide the Commission with the information it needs to assist the E911 stakeholders with implementation of this important service. In particular, Nokia is hopeful that the Commission will carefully consider Mr. Hatfield’s final recommendation of an adaptable regulatory approach to resolving the problems delaying the deployment of wireless E911 services.

**I. The Need For More Flexibility In the Commission’s Regulation of E911**

Nokia continues to believe that rigid enforcement of the Commission’s aggressive timing benchmarks and accuracy requirements has inhibited the deployment of E911. The Hatfield Report recognizes this type of inflexibility as a potential impediment to the success of E911

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<sup>1</sup> Dale N. Hatfield, *Report on Technical and Operational Issues Impacting The Provision of Wireless Enhanced 911 Services*, filed Oct. 15, 2002 (“the Hatfield Report”).

services. Mr. Hatfield states, “I agree with the notion that additional flexibility – rather than rigid rules – may, in some cases at least, actually facilitate the rollout of wireless E911 services.”<sup>2</sup> The report contains numerous feasible and useful recommendations on how the Commission can make its regulations more flexible. Nokia strongly urges the Commission to embrace a more adaptable regulatory approach to the rollout of E911. Such an approach would allow for a more uniform and manageable deployment of this important service.

## **II. No Need for Additional E911 Requirements**

The Hatfield Report recognizes that in an engineering project of the size of wireless E911, “constantly changing requirements will lead to scheduling delays.”<sup>3</sup> Nokia supports Mr. Hatfield’s recommendation that the Commission avoid the addition of new requirements during this critical stage of E911 rollout. Nokia and other equipment manufacturers that have been working diligently for better than eight years to deploy wireless E911 have been deterred in this effort by numerous changes in requirements promulgated by the Commission. Before accommodating specialized new requirements, the FCC first should ensure that basic Phase II wireless E911 services function properly. Until the baseline E911 foundation is complete, implementation of new features and capabilities for E911 cannot be supported.

## **III. Complexity of the Task and Coordination Among Stakeholders**

Nokia also supports the Hatfield Report’s recognition of the complexity of deployment of wireless E911 services in the United States and its recommendation of increased coordination among stakeholders. The large number of stakeholders and the complexity of their inter-relationships require “an unusually high degree of coordination and cooperation among public

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<sup>2</sup> The Hatfield Report, p. 45.

<sup>3</sup> The Hatfield Report, p. 40.

and private entities.”<sup>4</sup> From its own experience with E911, Nokia understands that provision of location information is a difficult, multifaceted task that is not completed simply with the revision of network software or through the development and sale of enhanced handsets. As the Hatfield Report recognizes, it is therefore crucial that all stakeholders be accountable for their part in the deployment of E911. The Commission has consistently required equipment manufacturers and wireless carriers to meet incredibly difficult timelines and accuracy benchmarks and has not, despite industry suggestions, engaged the other stakeholders such as the local exchange carriers, third party integrators and public safety entities in meaningful dialogue until very recently. Nokia encourages the Commission to continue this kind of coordination and oversight of the other stakeholders in the E911 process.

#### **V. Standardized Tests for Compliance**

As a manufacturer of wireless handsets for numerous air interface technologies and as a leading provider of GSM wireless system infrastructure in North America, Nokia is concerned about testing standards for E911 accuracy requirements. Nokia certainly acknowledges that compliance verification of an end-to-end E911 system is a daunting task. The industry, not the Commission, is best positioned to devise and implement technology test plans, most likely specialized and linked to particular air interfaces. While it is true that OET-71<sup>5</sup> is not a complete test specification,<sup>6</sup> the bulletin recommended that industry members work together to develop a description of processes to demonstrate accuracy. Accordingly, Nokia and other manufacturers have been working toward a standardized procedure for testing and certification of new wireless

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<sup>4</sup> The Hatfield Report, p. 21.

<sup>5</sup> OET Bulletin No. 71, *Guidelines for Testing and Verifying the Accuracy of Wireless E911 Location Systems*, Federal Communications Commission, April 12, 2000.

<sup>6</sup> The Hatfield Report, p. 35.

handsets that comply with OET-71. The Commission should support the results of this collaborative effort, which may lead to the development of a safe harbor for accuracy verification. Nokia believes that these efforts, though ongoing, may be the basis for testing and verification procedures.

In light of the pronouncements of the Commission in OET-71, Nokia has been actively researching ways to solve this problem by investigating test methods for some of the sub-systems involved in the complex E911 infrastructure. Nokia strongly supports utilization of the standards-based approach that Nokia and other wireless manufacturers have been working to develop. Through this open process, all affected parties are permitted, and indeed encouraged, to review and submit contributions to the development of the most effective, efficient methodology possible. Regardless of the method that proves to be the most workable and effective, Nokia does not believe that the Commission should mandate any proposals or methods.

## CONCLUSION

Nokia supports the efforts of the Commission and Mr. Hatfield and welcomes the Hatfield Report as an important first step toward the resolution of the current obstacles to deployment of wireless E911. Nokia urges the Commission to rely on the findings in the report and incorporate flexibility into its E911 regulations.

Respectfully submitted,

**Nokia Inc.**

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