

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

In the Matter of)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911)	RM-8143
Emergency Calling Systems)	

**Comments of the Wireless Communications Division
of the Telecommunications Industry Association**

Jesse Russell, Chairman
Wireless Communications Division,
Telecommunications Industry Association

Dan Bart, Vice President,
Standards and Technology
John Derr, Manager,
Technical & Regulatory Affairs
2500 Wilson Boulevard, Suite 300
Arlington, VA 22201
703-907-7703

June 17, 1999

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

In the Matter of)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911)	RM-8143
Emergency Calling Systems)	

**Comments of the Wireless Communications Division
of the Telecommunications Industry Association**

1. Introduction

The Wireless Communications Division (“WCD”) of the Telecommunications Industry Association (“TIA”) hereby submits its Comments in response to the June 1 request of the Wireless Telecommunications Bureau for targeted comment on Wireless E911 Phase II Automatic Location Identification (“ALI”) requirements.¹ TIA is the principal industry association representing telecommunications equipment manufacturers and suppliers, including manufacturers of terrestrial mobile radio equipment.²

¹ Public Notice, *Wireless Telecommunications Bureau Requests Targeted Comment on Wireless E911 Phase II Automatic Location Identification Requirements*, DA 99-1049, June 1, 1999.

² These comments reflect only the collective views of members of the TIA Wireless Communications Division. Moreover, these comments do not necessarily reflect the views of other divisions, other committees, or other members of TIA. Individual interested members of TIA may have differing views and may file on issues affecting them.

In the *E911 First Report and Order*, the Commission determined that the extensive technical and operational issues and standards necessary for implementation are best resolved by the expertise of the parties through their ongoing processes for consultation and standards setting.³ The 1997 Joint Annual Status Report subsequently identified the development of the official standard, J-STD-034, for Phase I that includes two types of transmission methodologies and Public Safety Answering Point ("PSAP") connections for Phase I information.⁴ J-STD-034, *Wireless Enhanced Emergency Services*, published in December, 1997, was jointly developed by TIA and Committee T1 [sponsored by the Alliance for Telecommunications Industry Solutions ("ATIS")].

In the *E911 Reconsideration Order*, the Commission reaffirmed its policy of being technologically and competitively neutral with respect to possible approaches to ALI, stating that it did "not intend that the implementation deadline, the accuracy standard, or other rules should hamper the development and deployment of the best and most efficient ALI technologies and systems."⁵

³ *E911 First Report and Order*, 11 FCC Rcd at 18712-14 (paras. 73-74).

⁴ National Emergency Number Association (NENA) *Ex parte* Filing, Feb. 1, 1999, "Report of CTIA, PCIA, APCO, NENA, NASNA, Alliance," at 12 (1998 Joint Annual Status Report).

⁵ *E911 Reconsideration Order*, 12 FCC Rcd at 22725 (para. 124).

2. Output of Standardization for Wireless E911 Phase II ALI Requirements Should Accommodate Different Technologies and Convey Whatever Information is Necessary in the Framework of a Common Interface

With regard to the standardization portion of the Wireless E911 Phase II ALI Requirements, in order to address the first question raised by the Commission, the TIA Engineering Subcommittee TR-45.2 on Wireless Intersystem Technology continues to maintain an Ad Hoc on Emergency Services (“Ad Hoc ES”). The TR-45.2 Ad Hoc ES is presently developing a Wireless E911 Phase II ALI standard [also to be published as a Joint Standard (“J-STD”), along the lines of J-STD-034], which will allow all of the known location technologies, both network-based and handset-based, to provide data to a PSAP in the framework of a common interface. This future J-STD is intended to convey whatever is necessary, in terms of data elements, thereby facilitating the Commission's policy of being technologically and competitively neutral with regard to possible approaches to ALI. The deliverable date for this J-STD is currently the fourth quarter of 1999. These TR-45.2 Ad Hoc ES meetings have and continue to be open to participation by all directly and materially interested parties, as required by the consensus standards process of the American National Standards Institute (“ANSI”) under which TIA is an accredited standards organization.

With regard to the second question raised by the Commission on how specifically to handle the issues of roaming and handset turnover, WCD considers this to be a wireless service provider implementation matter.

Concerning the third question raised by the Commission on whether the methodology for determining ALI accuracy under Phase II should be clarified or modified, WCD considers this to be an matter to be resolved between the FCC and wireless service providers.

3. Conclusion

The role of WCD in supporting the development of standards to support Wireless E911 Phase II ALI requirements is to allow all of the known location technologies, both network-based and handset-based, to provide data to a PSAP in the framework of a common interface. The standards are intended to convey whatever is necessary, in terms of data elements, thereby facilitating flexible solutions. This technologically open and competitively neutral approach allows for business decisions to be freely made as the marketplace requires.

Respectfully submitted,

Wireless Communications Division,
Telecommunications Industry Association

By: _____

Jesse Russell, Chairman
Wireless Communications Division,
Telecommunications Industry Association

Dan Bart, Vice President
Standards and Technology
John Derr, Manager
Technical & Regulatory Affairs
2500 Wilson Boulevard, Suite 300
Arlington, VA 22201
703-907-7703

June 17, 1999