

**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)	

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

The Wireless Communications Division¹ of the Telecommunications Industry Association ("TIA") hereby submits its Reply Comments in response to comments regarding the *ex parte* presentation filed by the Ad Hoc Alliance for Public Access to 9-1-1 ("Alliance") on September 17, 1998. TIA makes this filing to add its voice to those commenting who have expressed concern about the ability of the proposal submitted by the Alliance to achieve the goal of increasing the completion rate of 9-1-1 calls. As set out in the filing by the Cellular Telecommunications Industry Association ("CTIA") of October 7, 1998, the Alliance's proposal has been reviewed by TIA Engineering Committee, TR-45, which has made the following findings:

1. The mechanisms currently defined in standards are superior to the "Strongest Signal" proposal and that standards development activities related to this proposal are not warranted.
2. Other alternatives, such as automatic A/B roaming, are superior to the Alliance's proposal.

For the foregoing reasons, which are set out with more specificity in the attachments to the CTIA filing, TIA supports the comments by CTIA recommending the rejection of the Alliance's proposal and the investigation of the alternative approaches set out by TIA.

¹ These comments reflect only the 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. Other interested members of TIA may have differing views and may file on issues affecting them.

Respectfully submitted,

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October 19, 1998

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