



# PUBLIC NOTICE

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## **WTB SEEKS COMMENT ON WIRELESS E911 PHASE II WAIVER REQUEST FILED BY AT&T WIRELESS SERVICES, INC.**

**CC DOCKET NO. 94-102**

**Comments Due: October 4, 2001**

**Reply Comments Due: October 11, 2001**

The Federal Communications Commission's (Commission's) rules require wireless carriers to begin to deploy the capability to identify the precise location of wireless 911 calls beginning on October 1, 2001, provided certain conditions are met.<sup>1</sup> This capability is called Phase II Automatic Location Identification (ALI). The Phase II rules establish deployment schedules and set accuracy and reliability requirements for both handset-based and network-based ALI technologies.<sup>2</sup>

On April 4, 2001, AT&T Wireless Services, Inc. (AT&T) requested a waiver of the E911 Phase II rules to permit it to deploy a hybrid network and handset-based technology called Enhanced Observed Time Difference of Arrival (E-OTD) throughout its planned Global System for Mobile Communications (GSM) air interface network and a technology called Mobile-Assisted Network Location System (MNLS) for its current Time Division Multiple Access (TDMA) network.<sup>3</sup>

On September 17, 2001, AT&T filed a letter amending its request for waiver with respect to its TDMA network.<sup>4</sup> In lieu of implementing MNLS as its E911 Phase II network-based solution for its TDMA network, AT&T seeks permission to deploy either TruePosition or Grayson Wireless (Grayson)'s network overlay technologies. AT&T believes that it will be able to secure a contractual commitment from one of these two technology vendors within the next 30 days. Both TruePosition and Grayson have represented

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<sup>1</sup> See 47 C.F.R. §§20.18(e)-(j).

<sup>2</sup> 47 C.F.R. §§20.18(f)-(h).

<sup>3</sup> AT&T Wireless Services, Inc. Request for Waiver of the E911 Phase II Location Technology Implementation Rules, filed April 4, 2001.

<sup>4</sup> *Ex Parte* Letter from Douglas I. Brandon, AT&T Wireless Services Inc. to Thomas Sugrue, Chief, Wireless Telecommunications Bureau, CC Docket No. 94-102, filed September 17, 2001.

to AT&T that their E911 Phase II solutions will meet the Commission's accuracy requirements and that they have the resources available to install their solutions in those TDMA markets where AT&T currently has valid PSAP requests for Phase II E911 service beginning no later than November 1, 2001, and ending no later than December 31, 2002. After 2002, AT&T expects to be able to deploy Phase II technology within six months of a valid PSAP request. In markets that utilize a combination of air interfaces other than TDMA or TDMA/AMPS, such as TDMA/GSM, AT&T plans to deploy either TruePosition's or Grayson's network overlay solution, or another solution that complies with the Commission's rules or for which AT&T has previously obtained a waiver.

We seek comment on this waiver request. Parties interested in filing comments may do so on or before **October 4, 2001** and reply comments on or before **October 11, 2001**.

This is a "permit but disclose" proceeding pursuant to § 1.1206 of the Commission's Rules.<sup>5</sup> Presentations to or from Commission decision-making personnel are permissible provided that *ex parte* presentations are disclosed pursuant to 47 C.F.R. § 1.1206(b).

Comments may be filed using the Commission's Electronic Comment Filing System (ECFS) or by filing paper copies. Comments filed through the ECFS can be sent as an electronic file via the Internet to <http://www.fcc.gov/e-file/ecfs.html>. In completing the transmittal screen, commenters should include their full name, Postal Service mailing address, and the docket number of this proceeding. Parties that choose to file by paper must file an original and four copies of each filing with the Office of the Secretary, Federal Communications Commission, 445 12<sup>th</sup> Street, S.W., Washington, D.C. 20554, and a diskette copy with the Commission's copy contractor Qualex International, Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC, 20554. The filing should include the docket number of this proceeding: CC Docket No. 94-102. Filings and comments are also available for inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC, 20554. They may also be purchased from the Commission's duplicating contractor, Qualex International, Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC, 20554, telephone 202-863-2893, facsimile 202-863-2898, or via e-mail [qualexint@aol.com](mailto:qualexint@aol.com).

For further information concerning this proceeding, contact Jennifer Tomchin, Policy Division, Wireless Telecommunications Bureau, at (202) 418-1310.

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<sup>5</sup> 47 C.F.R. § 1.1206.