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Alliance for Telecommunications
Industry Solutions

Problem Solvers to the
Telecommunications Industry



June 19, 2000



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JUN 19 2000

VIA HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
45 12th Street, SW
Washington, DC 20054



Re: Revisions of the Commission's Rules to Ensure Compatibility with
Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102



Dear Ms. Salas:



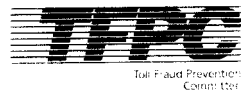
Enclosed are an original and five copies of the comments on behalf of ATIS' sponsored Committee T1 in response to the Commission's recent public notice in the above-captioned case. Please date-stamp and return the extra copy to our messenger.



Please contact me 202/434-8847 if you have any questions or comments.



Sincerely,



Megan Campbell
General Counsel



Enclosures



No. of Copies rec'd 014
List A B C D E



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JUN 19 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

In the Matter of

Revisions of the Commission's Rules
To Ensure Compatibility with
Enhanced 911 Emergency
Calling Systems

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CC Docket No. 94-102

**COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS
INDUSTRY SOLUTIONS (ATIS)**

COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS
INDUSTRY SOLUTIONS (ATIS)

ATIS submits these comments on behalf of its sponsored Committee T1 in response to the Commission's recent public notice issued in the above-captioned proceeding soliciting comments with respect to "a proposed revised deadline for compliance with the Commission's rule requiring transmitting of text telephone (TTY) 911 calls on digital wireless systems, pursuant to 47 C.F.R. § 20.18(c)."¹

Specifically, ATIS provides information regarding the GSM work currently underway in the Committee T1 Working Group T1P1.3 (previously T1P1.5)² and the impact the international use of the GSM air interface may have on ". . . the speed with which a TTY solution can be developed. . . ."³

Committee T1, a sponsored committee of ATIS, accredited by the American National Standards Institute (ANSI) develops interconnection and interoperability standards, technical reports and technical requirements for the United States telecommunications networks. Committee T1 also develops technical positions on related subjects under consideration in various international standards bodies.

T1P1 is one of six Technical Subcommittees (TSC) of Committee T1 and addresses issues related to wireless and/or mobile services and systems, including service descriptions and wireless technologies. T1P1.3, the Mobile/Wireless GSM/3G System and Network Working Group, develops, maintains, amends and enhances American National Standards and other T1 deliverables related to system aspects, networks, and

¹ Public Notice, DA 00-1091 (May 17, 2000).

² During the Plenary Session of T1P1 on May 12, 2000, the T1P1.5 Working Group was disbanded and a new Working Group, T1P1.3 (Mobile/Wireless GSM/3G System and Network Working Group) was formed. The GSM work regarding TTY now resides in T1P1.3.

³ Public Notice, DA 00-1091 (May 17, 2000).

terminals within the GSM family (GSM/EGPRS/UMTS). The T1P1.3 mission states that this work may be done within T1P1 or in close cooperation with other regional and international standards and specification groups to ensure that the non-radio technology meets North American regulatory and commercial requirements.⁴

As the Commission indicated in its public notice, T1P1.3 has adopted a potential solution to the TTY/digital problem for GSM networks. The Commission further stated that, "After edits are completed, balloting on this proposed standard is tentatively scheduled to begin July 28, 2000, and a standard for GSM networks could be available as early as September 2000."⁵ While the balloting is still anticipated to begin immediately following the July 24-28, 2000 T1P1 meeting and it is possible that a standard could be approved by September 2000, the current ANSI approval and editing process takes on average another two months resulting in a November 2000 availability date.⁶ Nonetheless, all manufacturers participating in the process could have access to the approved pre-publication standard as early as September 2000.

In response to the Commission's comments regarding International Implications, ATIS provides the following information. In keeping with the timeline imposed by the Commission, Committee T1 plans to adopt a national Standard pursuant to the tentative dates provided above. In addition, T1P1, through liaison activities, has been providing contributions to the Third Generation Partnership Project (3GPP)⁷ in anticipation of the

⁴ Additional information regarding Committee T1, Technical Subcommittee T1P1, or Working Group T1P1.3, can be found on the ATIS web site at <http://www.atis.org> or the Committee T1 web site at <http://www.t1.org>.

⁵ Public Notice, DA 00-1091 (May 17, 2000).

⁶ ANSI currently edits all Committee T1 Standards, however, the editing responsibilities will be transitioned to ATIS during the last quarter of 2000 and this transfer of responsibilities is expected to result in a shorter period of time from approval to publication.

⁷ The 3GPP is a cooperative effort among its Organizational Partners for the production of Technical Specifications for a 3rd Generation Mobile System based on the evolved GSM core networks and the radio access technologies. The Organizational Partners include: ATIS/Committee T1, the European Telecommunications Standards Institute (ETSI), the Association of Radio Industries and Businesses (ARIB - Japan), the Telecommunications Technology Committee (TTC - Japan), the Telecommunications

development of an international solution. The international work is expected to result in an expansion of the Committee T1 national Standard to support additional capability beyond the Baudot-encoded audio tones. It deserves mention here that should an International Standard be developed, there are options available such as a “pointer document” whereby Committee T1’s published Standard contains a reference(s) to the International Standard.

Technical Subcommittee T1P1 and its Working Group T1P1.3 will continue to work towards a national Standard for the transmission of TTY 911 calls over GSM networks while providing input to similar efforts occurring on an International level. These activities will, of course, be conducted as expeditiously as permitted within the process with a goal of providing as much time as possible for equipment manufacturers and carriers to complete the implementation of the solution prior to the Commission’s eventual deadline.

Respectfully submitted,



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Dated: June 19, 2000

Technology Association (TTA – Korea) and the China Wireless Telecommunication Standard Group (CWTS).