

Standards Committee T1

Carrier Liaison Committee

Telecommunications
Industry Forum

Ordering and Billing
Forum

Network Interconnection
Interoperability Forum

Industry Numbering
Committee

Protection Engineers
Group

Standards Committee O5

Network Reliability
Steering Committee

Internetwork
Interoperability Test
Coordination Committee

Telecommunications
Fraud Prevention
Committee

Generic Requirements
Users Group

International Forum on
ANSI-41 Standards
Technology

Interactive Voice
Response Forum

TTY Forum

Administrative Council for
Terminal Attachments

IMSI Oversight Council

August 19, 2002

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *Wireless Telecommunications Bureau Seeks Comment on
Petition for Reconsideration Regarding the Commission's Rules
on Non-Initialized Phones and on Filing of Request for Stay, CC
Docket No. 94-102, Public Notice, DA 02-1575 (rel. July 3,
2002)*

Dear Ms. Dortch:

Enclosed are reply comments of the Alliance for Telecommunications Industry Solutions ("ATIS"), on behalf of the Emergency Services Interconnection Forum ("ESIF"), in response to the Commission's recent public notice, in the above-captioned case.

Consistent with the Commission's Rules, I am filing one electronic copy of this Petition and request that you place it in the record of the proceedings. Please contact me at 202/434-8847 if you have any questions or comments.

Sincerely,

Megan L. Campbell
General Counsel

Enclosure

cc: Jared Carlson, Deputy Chief, Policy Division, WTB (jcarlson@fcc.gov)
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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

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

The Alliance for Telecommunications Industry Solutions (“ATIS”)¹, on behalf of the Emergency Services Interconnection Forum (“ESIF”)², hereby submits these reply comments in the above captioned proceeding³ and in further support of its Petition for Reconsideration (“Reconsideration Petition”) and Request for Stay of Effective Date (“Stay Request”), both filed contemporaneously on June 12, 2002, pursuant to the Commission’s *Report and Order*⁴ in this proceeding. In its Reconsideration Petition, ATIS requested that the Commission reconsider the requirements found in the new subsections (1)(1)(i) and (1)(2)(i) of Section 20.18 of the Rules

¹ ATIS is a member company organization that develops standards and operating procedures for the telecommunications industry. More than 1,500 experts from over 400 telecommunications companies participate in ATIS’ 19 committees, forums, and Incubator Solutions programs, where work focus includes wireline and wireless network interconnection standards, number portability, improved data transmission, Internet telephony, toll-free access, telecom fraud, and order and billing issues, among others. ATIS is accredited by the American National Standards Institute (ANSI). Further information may be found on the ATIS web site at www.atis.org.

² The ESIF is a sponsored committee of ATIS jointly convened by ATIS and the National Emergency Number Association (NENA) to facilitate the identification and resolution of technical issues related to the interconnection of the telephony and emergency services networks. The ESIF is an open, technical forum encouraging the voluntary participation of interested parties to identify and resolve recognized interconnection issues.

³ See *Wireless Telecommunications Bureau Seeks Comment on Petition for Reconsideration Regarding the Commission’s Rules on Non-Initialized Phones and on Filing of Request for Stay*, CC Docket No. 94-102, *Public Notice*, DA 02-1575 (rel. July 3, 2002).

⁴ See *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Non-Initialized Phones*, CC Docket No. 94-102, RM-8143, *Report and Order*, FCC 02-120 (rel. April 29, 2002).

regarding the use of the sequential number code 123-456-7890, as the telephone number/mobile identification number in non-service initialized handsets. The Stay Request sought a stay of the October 1, 2002 effective date of the above-cited rules. These reply comments provide confirmation of the ESIF's intent and willingness to further study and report to the Commission on potential alternative solutions to the currently proposed sequential number code.

The Reconsideration Petition pointed out several negative impacts relating to the implementation of the sequential number code and discussed at least one potential alternative solution found in an industry technical standard – J-STD-036, “Enhanced Wireless 9-1-1 Phase 2⁵. Five sets of comments were filed in response to the Commission's Public Notice seeking comments on the Reconsideration Petition and related Stay Request. The comments all supported the notion, as premised on the information provided in the Reconsideration Petition, that further technical review is appropriate before a particular methodology is mandated for use as the telephone number/mobile identification number in non-service initialized handsets.

The ESIF has formed a study group and has work underway to further explore alternative solutions. The ESIF has the technical resources and appropriate representation to thoroughly and completely review the matter. Upon completion of the activity, the ESIF stands ready to report its findings and recommendations to the Commission and the industry at large. Accordingly, the Commission's grant of the Stay Request for a period of time sufficient to allow the ESIF the necessary time allotment to complete its review would be consistent with the comments received.

⁵ J-STD-036 is a joint standard by the Telecommunications Industry Association (“TIA”), on behalf of Committee TR-45, and ATIS, on behalf of its sponsored Committee T1.

The ESIF has considered the work before it and believes that a report of its findings and recommendations could be finished and submitted to the Commission prior to March 1, 2003.

CONCLUSION

For the foregoing reasons, ATIS, on behalf of the ESIF, respectfully requests that the Commission grant its Stay Request. Based on the information provided in the original Reconsideration Petition, as well as the comments filed in support of it, ATIS respectfully requests that the Commission grant the Reconsideration Petition. In the alternative, ATIS requests that the Commission hold the Reconsideration Petition in abeyance pending the submission of the ESIF's report on its findings and recommendations as advocated in the CTIA comments⁶.

Respectfully Submitted,

ATIS on behalf of the ESIF

/s/ Megan L. Campbell _____

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August 19, 2002

⁶ See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Comments of the Cellular Telecommunications & Internet Association* (Aug. 2, 2002).