

EX PARTE OR LATE FILED



Problem Solvers to the
Telecommunications Industry

Standards Committee T1

March 5, 2003

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Network Interconnection
Interoperability Forum

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Industry Numbering
Committee

Protection Engineers
Group

Standards Committee O5

Re: ATIS/ESIF *Ex Parte* Communication in CC Docket No. 94-102
(Non-Service-Initialized-Phones Order) Clarification to ATIS/ESIF
February 24, 2003 *Ex Parte* Letter

Network Reliability
Steering Committee

Internetwork
Interoperability Test
Coordination Committee

Dear Ms. Dortch:

Enclosed is an *ex parte* communication from the Alliance for
Telecommunications Industry Solutions ("ATIS"), on behalf of the
Emergency Services Interconnection Form- ("ESIF").

Telecommunications
Fraud Prevention
Committee

International Forum on
ANSI-41 Standards
Technology

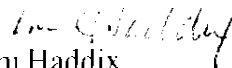
Consistent with the Commission's Rules, I am filing one original and one
copy of this *ex parte* communication, and request that you place it in the
record of the proceedings in the above-referenced docket. Please contact
me at (202) 434-8830 if you have any questions or comments.

Interactive Voice
Response Forum

Sincerely,

TTY Forum

Administrative Council for
Terminal Attachments


Tom Haddix
Staff Attorney

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IMSI Oversight Council

Enclosures

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Problem Solvers to the
Telecommunications Industry

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Standards Committee T1
Telecommunications
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Mr. John Muleta
Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20553

Network Interconnection
Interoperability Forum
Industry Numbering
Committee

Re: ATIS/ESIF Ex Parte Communication in CC Docket No. 94-102 (Non-Service-Initialized-I'phones Order) Clarification to ATIS/ESIF February 24, 2003 Ex Parte Letter

Protection Engineers
Group

Dear Mr. Muleta:

Standards Committee Of
Network Reliability
Steering Committee
Inter-network
Interoperability Test
Coordination Committee

The purpose of this communication is to provide the Federal Communications Commission ("FCC" or "Commission") with further clarifying information regarding the *Ex Parte* correspondence dated February 24, 2003 filed by the Emergency Services Interconnection Forum (ESIF) in the matter referenced above (the "Letter"). Specifically, the ESIF is providing the clarification below in the context of the second to the last paragraph of the Letter regarding the implementation of the ESIF recommended technical solution, J-STD-036, Annex C.¹

Telecommunications
Fraud Prevention
Committee
International Forum on
ANSI-41 Standards
Technology

The ESIF would like to sensitize the Commission to the fact that the implementation of the Annex C solution, while determined to be the best available technical solution to the non-service-initialized handset problem, is more complex and far reaching than the implementation of the Commission's proposed sequential number code. Accordingly, the ESIF encourages the Commission to address the implementation aspect further through the appropriate processes with the affected public safety entities and service providers before establishing mandated compliance with Annex C. The ESIF -- public safety interests, service providers and manufacturers alike -- understands the importance of a timely solution to the non-service-initialized phone problem and, for that reason, stands ready to address the implementation of the Annex C solution in an expeditious manner. The ESIF has encouraged its members to contact the Commission with information relevant to the implementation issue. And, to the extent possible given the nature of the ESIF as an industry technical body, the ESIF itself will provide the Commission with information.

Interactive Voice
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Administrative Council for
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Should you have any further questions regarding the original letter or this clarification, please contact the ATIS General Counsel, Megan Campbell, at

Emergency Services
Interconnection Forum

¹ T-VU-036, "Enhanced Wireless 9-1-1 Phase 2." August 2000 (published as a joint standard by the Telecommunications Industry Association ("TIA") on behalf of Committee TR-45 and ATIS, on behalf of Committee T1).



202-434-8847. Ms. Campbell will coordinate with the ESIF leadership. In addition, Ms. Campbell will contact the appropriate members of your staff to explore an opportunity for the ESIF members to meet with the Commission regarding the implementation of the Annex C solution.

Sincerely,

Jim Nixon
ESIF Chair

cc: James Schlichting, Deputy Chief, WTB (jschlich@fcc.gov)
Jared Carlson, Deputy Chief, Policy Division, WTB (jcarlson@fcc.gov)
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John Melcher, ESIF Co-Convenor, NENA, (jmelcher@911.org)
Megan Campbell, ATIS General Counsel, (mcainpbell14atis.org)