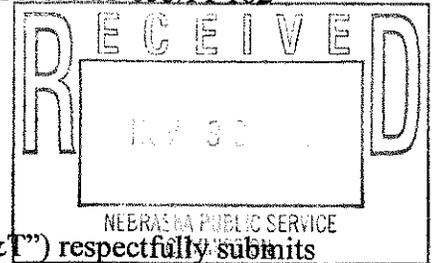


BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission,)
on its own motion, seeking to)
investigate and revise wireless)
tower testing standards and)
procedures pursuant to the)
Enhanced Wireless Services Act,)
Neb. Rev. Stat. § 86-442 et seq.)

Application No. 911-055/PI-182



COMMENTS OF AT&T MOBILITY

New Cingular Wireless PCS, LLC d/b/a AT&T Mobility (“AT&T”) respectfully submits

the following comments in response to the Nebraska Public Service Commission’s October 12 Order Opening Docket and Seeking Comment (“Order”). In its Order, the Commission invited interested parties to offer potential revisions to the Commission’s existing tower testing standards and procedures.

Summary

The Commission should eliminate the current requirement that wireless carriers coordinate test plan schedules with the Director and the requirement that wireless carriers file test plans with the Commission in advance of commencing testing. Order, at 3 (Appendix A). All of the details associated with formulating and implementing test plans are thoroughly discussed and mutually agreed to between AT&T and Public Safety Answering Points (“PSAPs”) in advance of testing. Significantly, none of the almost 150 plans previously filed with the Commission by AT&T has prompted any concerns. Notably, the Commission on its own motion has already suspended “the requirement that wireless carriers notify the Commission prior to all testing of wireless towers.” (Order, at 2).

In addition, the Commission should eliminate the requirement that wireless carriers schedule testing two weeks in advance. Order, at 3 (Appendix A). AT&T and PSAPs already “mutually agree to test dates and times,” as is currently required of them, *id.*, and there is no

reason that they should not be permitted the flexibility to mutually agree to conduct testing less than two weeks prior to activating enhanced 911 service.

Finally, the Commission should modify the requirement that test plans “identify phone dial plans to be tested” and the requirement that testing “include an activated phone, a non-activated phone, a roamer/traveler phone, and any pre-paid dial plans offered by a carrier.” *Id.* Wireless 911 service is available to any activated handset, regardless of the dialing plan to which a customer subscribes, and to any non-activated handset. Additionally, testing of both types of handsets is only needed at the Mobile Switching Center (“MSC”) level, the point to which calls are transmitted from a tower or other cell site. Thus, the Commission should merely require that (1) testing include both an activated phone and a non-activated phone at the MSC level; and (2) testing only include an activated phone at any specific tower or other cell site.

Discussion

AT&T appreciates the opportunity to comment on the Commission’s wireless tower testing standards and procedures. AT&T has extensive nationwide experience in the deployment of Phase I and Phase II enhanced wireless 911 services, having provided these services to over approximately 4,500 PSAPs in the United States. Customer safety is of paramount importance to AT&T, and the company well appreciates the trust and confidence customers place in the reliability of wireless 911 service.

AT&T performs extensive enhanced 911 service testing of its towers and other portions of its network each time it deploys enhanced Phase I and Phase II wireless services. New deployments aside, however, a wireless network is in a constant state of transition. Thus, to ensure continued reliable 911 service delivery, AT&T ensures that testing is also conducted whenever such network changes follow the initial deployment of Phase I and Phase II services.

For example, maintenance and repair activities, upgrades (e.g., adding capacity to existing sites) or other modifications to the wireless network, including its towers, are common events. Anytime such work is performed in an area in which Phase I or Phase II services have been deployed, it is AT&T's practice to test any affected tower or other affected network facility to ensure that enhanced 911 service delivery will remain reliable and will not encounter any negative impacts.¹

Test Plan Coordination and Advance Filing -- The Commission's current standards and procedures require a wireless carrier, the PSAP and the Director to "establish schedules for testing," and further, require the wireless carrier to "file a test and acceptance plan with the Commission" before testing is conducted. Order, at 2; *id.*, at 3 (Appendix A). These requirements should be eliminated. AT&T and PSAPs already thoroughly discuss and come to mutual agreement on all of the details associated with formulating and implementing test plans well before any testing is commenced. No test plans submitted to the Commission by AT&T have drawn any material questions, much less concerns.

AT&T's nationwide practice is to provide a PSAP with a Test Validation Worksheet ("TVW") listing each tower site and call sector to be tested, identifying them by network designation, street address and geographic coordinates (longitude and latitude), among other information. This worksheet also includes the pseudo-Automatic Number Identifications ("or pANIs") to be used and the egress number for basic routing of overflow calls. The call routing recommendations and site addresses are subject to the PSAP's approval, which approval must be

¹ Having said this, the appropriate level of testing applied in such projects may not require the full testing protocols applicable to new deployments of wireless service and associated enhanced 911 service activations (i.e., new deployments of Phase I or Phase II service where a wireless carrier is already providing service, which is the context to which the Commission's current requirements appear to apply). Typically, in such projects, no impact will occur to the Automatic Location Information ("ALI") database or Phase II (location estimate determination) technology. However, AT&T thoroughly tests each affected site and call sector to ensure that proper call routing as well as accurate and complete delivery of ALI remain intact and unaffected by the project work.

obtained prior to commencing any testing. Over the years, AT&T has submitted test plans to the Commission for the deployment of approximately 146 sites in Nebraska. AT&T is not aware of any case in which the Commission has either delayed testing or otherwise questioned the test plan, and AT&T knows of no benefit to either the Commission or customers of wireless service for the Commission to be involved before-the-fact with the scheduling and conducting of the tests. The testing process actively involves only the PSAP and the wireless service provider, and experience shows that any arrangements they make for mutually agreeable testing dates and times are adequate.

Of course, to the extent that the Commission wishes to review completed test results or to retain copies of the test results for its own purposes, either can readily be accomplished after testing has been completed. In fact, the Commission's standards and procedures already provide that "[a] copy of the completed test and acceptance plan shall be filed with the Commission within 30 days of successful completion of testing" Order, at 4 (Appendix A). AT&T has routinely met this requirement in a timely mannerly and would have no objection were the Commission to determine that it should remain in place.

For these reasons, AT&T respectfully submits that the Commission should eliminate the requirements that test scheduling be coordinated with the Director and that a test plan be filed with the Commission in advance of testing. Elimination of this requirement by the Commission is consistent with its having already determined that "[p]ending completion of the Commission's review, the requirement that wireless carriers notify the Commission prior to all testing of wireless towers is suspended." Order, at 2.

Two-Week Advance Scheduling -- The Commission's standards and procedures currently require that "[a]ny testing must be scheduled at least two weeks in advance, unless all parties agree otherwise." Order, at 3 (Appendix A). As was explained above, the formulation

and approval of a test plan are routinely well-addressed by AT&T and the PSAP. As part and parcel of this bilateral process, AT&T and the PSAP also mutually agree on a satisfactory test date and time for testing. AT&T attempts to schedule testing sufficiently in advance -- typically several days -- to provide the PSAP with time to suggest changes and to obtain additional call answering resources, if needed. If it appears that additional time is necessary or appropriate before testing is undertaken, the PSAP and AT&T mutually agreed to a different date and/or time.

This flexible, bilateral process is quite consistent with the Commission's requirement that the "wireless carrier and the PSAP shall mutually agree to test dates and times." *Id.* Under these circumstances, there is no reason that wireless carriers and PSAPs should be denied the opportunity to mutually agree to testing less than two weeks prior to activating enhanced 911 service.

Identification of Dial Plans -- The Commission's testing standards and procedures currently require that test plans "identify phone dial plans to be tested" and that testing "include an activated phone, a non-activated phone, a roamer/traveler phone, and any pre-paid dial plans offered by a carrier." *Id.* These standards and procedures should be modified to merely require that (1) testing include both an activated phone and a non-activated phone, since wireless 911 service is available to any activated handset, regardless of the dial plan to which the customer subscribes, as well as to any non-activated handset; and (2) both phones should be tested at the Mobile Switching Center level, the point to which calls are transmitted from a tower or other cell site and (3) testing include only an activated phone at any specific tower or other cell site.

As noted earlier, whenever AT&T receives a request from a PSAP for either Phase I or Phase II service, it provides the PSAP a TVW which lists each cell site that should route to the PSAP, its geographic coordinates and street address, and the pANI range which will be used to

route calls to the PSAP. The PSAP is asked to approve the call routing and addressing, or make changes, if they feel it necessary. This is the information that will generate the ALI record on a wireless call, and the PSAP has the final say over how it is displayed (within the technical limitations of the display system). Once PSAP approval of the test plan is obtained, test calls are ready to proceed at the agreeable date(s) and time(s).

At the beginning of a test, 911 calls should be placed from both a handset with a working mobile number (i.e., an activated handset) and from a handset with a non-working mobile number (i.e., a non-activated handset). Both a handset which places calls on a local or roamer/traveler basis as well a handset held by a customer who subscribes to service on a pre-paid basis are regarded as an activated handset. Stated another way, whether an activated handset is used on a "roamer/traveler" basis or on a pre-paid plan basis is irrelevant insofar as testing is concerned. While a non-activated handset cannot make or receive regular calls and does not have a working telephone number, the FCC nevertheless requires that the handset be allowed to reach 911 if it is otherwise functional and within a wireless service area offering a compatible air interface. Thus, all non-activated handsets are capable of reaching 911. Therefore, the Commission should adopt guidelines that should only require testing to include activated and non-activated handsets, consistent with the technology.

The 911 service capability of each of the handsets noted above is evaluated solely by reference to the MSC to which calls are transmitted from a tower or other cell site. Consequently, both handsets need only be tested once, at the beginning of the test plan, and not at each cell site served by an MSC. Beyond this MSC-level testing, it then becomes necessary only to test a working handset at each individual tower or other cell site, so as to ensure that the site has been provisioned in such a way that the proper information is displayed to the PSAP. A test of a non-activated handset at each cell tower or other cell site is unnecessary because, in an

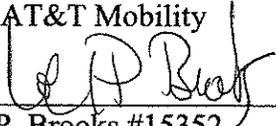
instance where a 911 call is made from such a handset, the PSAP will receive all of the same information transmitted to it from an activated handset except for a working telephone number.

Conclusion

AT&T appreciates the Commission's interest in the subject of testing standards and procedures, and the opportunity to suggest changes to them based on AT&T's testing experience. AT&T believes that maintaining reliable 911 service is vitally important. Its suggestions above, which we urge the Commission to adopt, are made in that spirit.

Respectfully submitted this 30th day of November, 2011.

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d/b/a AT&T Mobility

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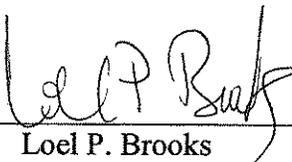
Attorneys for AT&T Mobility, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of November, 2011, an original, five copies and an electronic copy of the Comments of AT&T Mobility, in Application No. 911-055/PI-182 were delivered to:

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