

Statement of Delbert Wilson
FCC E911 Coordination Initiative
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In addition to my responsibilities with Central Texas and West Central Wireless, I also serve as Vice President of the Board of Directors for the Rural Telecommunications Group, Inc. RTG is a 501(c)(6) trade association whose membership includes 700 MHz, CMRS, and PCS license-holders, among others. RTG's mission is to promote wireless opportunities for rural telecommunications companies through advocacy and education.

Rural wireless carriers have been working diligently to implement the FCC's Phase II E911 requirements. We are doing so, not just out of necessity, but because we believe in supporting and improving the safety, and well-being of our customers – our families, friends, and neighbors – to the best of our ability. Even with our limited resources and smaller customer bases, rural carriers have made tremendous strides in upgrading their networks and in coordinating with their local PSAPs to make Phase II capability a reality.

However, the story remains the same for rural wireless carriers: E911 deployment obstacles are greater in rural areas. A wireless carrier's ability

deploy Phase II service utilizing a network-based solution depends upon the ability to triangulate the location of a transmitted signal from various receiving sites. In rural areas, as the Commission is aware, there are not always enough cell sites to serve as triangulation points, making it difficult or impossible to achieve the FCC's required level of accuracy.

Building more towers in rural areas simply to achieve higher accuracy standards is not a feasible solution. However, rural carriers are also challenged by the lack of available GSM and TDMA handsets, which currently are our best "bet" for achieving the FCC's accuracy requirements. In addition, we have recently discovered that CDMA handsets, previously thought to be capable of providing Phase II level service, currently lack the technical capability to meet these requirements. Therefore, we believe that the best solution for achieving Phase II deployment in rural areas is for the FCC to require that *all* handsets be ALI-capable. Indeed, the Commission should use its ancillary authority to require GPS handsets for all technologies, for all carriers, in all areas. That is the only way rural carriers, rural emergency officials – and most importantly rural citizens - can be assured we may achieve the accuracy levels required of rural wireless carriers.

Regardless of the technological method employed to achieve Phase II accuracy, rural wireless carriers -- and indeed all parties involved in E911, must have a cost recovery mechanism available to allow the expenditure of resources necessary to achieve the Commission's important public policy goal as expeditiously as possible. We recommend that the Commission, and Congress as well, continue to pursue options to fund E911 implementation in order to ensure rural carriers and rural citizens are not adversely burdened by the costs of meeting Phase II E911 implementation.

Commissioner Adelstein, thank you for the opportunity to participate in today's panel. I look forward to your questions.