

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
T-Mobile USA, Inc.)	File No. EB-02-TS-624
Washington, D.C.)	NAL/Acct. No. 200332100002
)	FRN 0006-9459-50
)	

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: March 4, 2003

Released: March 5, 2003

By the Commission:

I. INTRODUCTION

1. In this *Notice of Apparent Liability for Forfeiture* (“NAL”), we find that T-Mobile USA, Inc. (“T-Mobile”)¹ apparently failed to provide Enhanced 911 (“E911”) Phase I services within six months of over 450 valid requests by the designated Public Safety Answering Point (“PSAP”) in willful and repeated violation of Section 20.18(d) of the Commission’s Rules (“Rules”).² For the reasons discussed below, we find T-Mobile apparently liable for a forfeiture in the amount of One Million Two Hundred Fifty Thousand Dollars (\$1,250,000).

II. BACKGROUND

2. Under Phase I of the E911 rules, wireless carriers are required to provide to the designated PSAP the telephone number of the originator of a 911 call and the location of the cell site or base station receiving a 911 call from any mobile handset accessing their systems by April 1, 1998, or within six months of a valid request by the designated PSAP, whichever is later.³ A PSAP request for service is deemed valid if the PSAP can demonstrate that (1) a mechanism is in place for recovering the PSAP’s costs; (2) the PSAP has ordered the equipment necessary to receive and use the E911 data to be installed no later than six months following the PSAP’s request; and (3) the PSAP has made a timely request to the appropriate LEC for the necessary trunking and other facilities, including any necessary Automatic Location Information (“ALI”) database upgrades.⁴

¹ T-Mobile was previously known as VoiceStream Wireless Corporation. For convenience, we will refer to this carrier as T-Mobile throughout this document.

² 47 C.F.R. § 20.18(d).

³ 47 C.F.R. § 20.18(d) and (j).

⁴ *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas*, Order, CC Docket No. 94-102, 16 FCC Rcd 18982, 18986-87 (2001)

3. In May 2002, T-Mobile met with Commission staff and disclosed that it was out of compliance with the Phase I E911 rule. The Enforcement Bureau subsequently began an investigation and, on October 11, 2002, sent a letter of inquiry (“LOI”) to T-Mobile seeking additional information concerning T-Mobile’s compliance with the Phase I E911 rule.⁵ T-Mobile responded to the LOI on November 1, 2002.⁶

4. In its LOI response, T-Mobile reported that it had 531 unmet PSAP requests for Phase I service that were at least six months old during the period from May 1, 2002 through October 1, 2002. Of these 531 requests, 50 requests were for areas in which T-Mobile was not providing coverage. In addition, T-Mobile stated that 120 of the 531 requests have been fulfilled since May 1, 2002, although it does not provide any explanation for the delay in fulfilling these requests. With respect to 170 of the 531 PSAP requests, T-Mobile indicated that the PSAPs are not currently ready to receive and utilize the Phase I location information due to PSAP funding issues and implementation problems on the PSAP side of the demarcation point.⁷ Specifically, T-Mobile asserted that 116 requests have been delayed by the LEC’s unwillingness to activate the PSAP’s Non-Call Path Associated Signaling (“NCAS”) connections due to insistence on a “valid request” from or contract with the PSAP and/or the LEC’s inability or unwillingness to implement the E-2 interface⁸ or turn up service using that interface; that 45 requests involve instances in which the PSAP requested that T-Mobile delay implementation or place the request on hold⁹ or in which the PSAP reported technical problems on its side of the demarcation point; and that

(“Richardson Order”), recon. granted in part, denied in part, *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas*, Order on Reconsideration, CC Docket No. 94-102, 17 FCC Rcd 24282 (2002).

⁵ Letter from Joseph P. Casey, Chief, Technical and Public Safety Division, Enforcement Bureau, to Brian T. O’Connor, Vice President, Legislative and Regulatory Affairs, T-Mobile USA, Inc. (October 11, 2002). In addition, on January 28, 2003, the 911 coordinator for ten PSAPs in Jefferson County, Colorado filed a complaint alleging that T-Mobile is not in compliance with the Phase I rules in Jefferson County. An investigation into the allegations raised in this complaint is currently pending.

⁶ Letter from Robert A. Calaff, Senior Corporate Counsel, Governmental and Industry Affairs, T-Mobile USA, Inc., to Joseph P. Casey, Chief, Technical and Public Safety Division, Enforcement Bureau (November 1, 2002).

⁷ T-Mobile classified these 170 PSAP requests as “invalid.” However, T-Mobile stated that for Phase I, it has generally presumed that a PSAP request is valid unless evidence is presented to the contrary, so it has not affirmatively set out to determine its validity. T-Mobile further stated that its experience has shown that there are issues on the PSAP’s side of the demarcation point that will affect the request’s validity that become apparent only as the deployment process proceeds. Based on the information provided by T-Mobile, we do not believe that these 170 PSAP requests are appropriately classified as “invalid.” In this regard, there is no evidence that these PSAP requests were not valid, as that term is defined in the *Richardson Order*, at the time they were filed. Rather, it appears that there is a question as to whether these PSAPs were *currently* ready to receive and utilize Phase I location information.

⁸ The E2 interface is the communications link between the PSAP’s ALI database and the carrier’s Mobile Positioning Center (“MPC”). It is through this link that ALI requests for Phase II data are transmitted and through which the data requested is returned by the MPC. See *Richardson Order*, 16 FCC Rcd at 18987. Although the E2 interface is part of the J-STD-036 standard interface for Phase II, T-Mobile indicated in its LOI response that it is also using the E2 interface to implement its Phase I NCAS connections.

⁹ T-Mobile identified six PSAPs which specifically requested that their Phase I requests be placed on hold. However, we note that each of these PSAP requests had been pending for more than six months at the time the

five requests have been delayed because of problems with the PSAP's funding. T-Mobile also indicated that there are 191 other valid PSAP requests for Phase I service which remain pending. T-Mobile asserted that some of these 191 requests have been subject to delays outside of its control, such as delays in executing service agreements and non-disclosure agreements with PSAPs, disagreements between T-Mobile and PSAPs over whether the NCAS, Call Associated Signaling ("CAS"), or hybrid CAS ("HCAS") transmission technology would be used, delays in the provision of trunks by LECs, PSAP non-responsiveness to T-Mobile's requests for information, and delays where the Phase I request is superceded by a Phase II request. T-Mobile acknowledged, however, that it has some responsibility for the implementation delays with respect to its unfulfilled PSAP requests.¹⁰

III. DISCUSSION

5. Section 20.18(d) of the Rules requires wireless carriers to provide to the designated PSAP the telephone number of the originator of a 911 call and the location of the cell site or base station receiving a 911 call from any mobile handset accessing their systems by April 1, 1998, or within six months of a valid request by the designated PSAP, whichever is later. The record indicates that T-Mobile had 481 PSAP requests for Phase I service that were at least six months old during the period from May 1, 2002 through October 1, 2002.¹¹ T-Mobile stated that 120 of these requests have been fulfilled since May 1, 2002. Notwithstanding the fact that these 120 PSAP requests had been completed by the time T-Mobile submitted its LOI response, T-Mobile clearly failed to fulfill these PSAP requests within six months of the date of the request. T-Mobile indicated that 170 PSAP requests involve PSAPs that are not currently ready to receive and utilize Phase I location information due to PSAP funding issues and implementation problems on the PSAP side of the demarcation point. We are not convinced, based on the sketchy and conclusory information provided by T-Mobile,¹² that all of these 170 PSAPs are not currently ready to receive and utilize Phase I location information. Further, although T-Mobile asserted that some of the remaining 191 PSAP requests have been subject to delays outside of its control, based on the sketchy and conclusory evidence provided by T-Mobile, we are likewise not convinced that all of the delays cited by T-Mobile are in fact outside of its control. We need not decide these issues, however, because T-Mobile acknowledged that it is responsible for some of the implementation delays with respect to its unfulfilled PSAP requests. Moreover, and significantly, while T-Mobile received a waiver of the E911 Phase II rules,¹³ it never received, and indeed never even requested, a waiver or other relief from the

PSAP requested the hold.

¹⁰ T-Mobile did not identify the specific PSAP requests with respect to which it believes it has responsibility for implementation delays, the specific reasons for the delays, or the length of the delays attributable to it.

¹¹ Appendix A lists these 481 PSAP requests. We are not counting, for purposes of this *NAL*, the 50 PSAP requests for Phase I service in areas in which T-Mobile was not yet providing coverage during the period covered by the LOI.

¹² The LOI issued to T-Mobile specifically directed that, for each unfulfilled Phase I PSAP request, T-Mobile provide a detailed explanation as to why the request had not been fulfilled and identify the specific actions taken by T-Mobile in an effort to fulfill each PSAP request and the dates on which such actions were taken. In many cases, T-Mobile provided only general reasons why certain categories of PSAP requests had not been fulfilled. In cases where T-Mobile did identify specific actions it had taken to fulfill a PSAP request, there was typically a substantial lapse of time, sometimes a period of years, between the date that the PSAP request was received by T-Mobile and the date of any specific action or actions taken by T-Mobile to fulfill the request.

¹³ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling*

Phase I requirements. Accordingly, based on the evidence before us, we conclude that T-Mobile apparently willfully¹⁴ and repeatedly¹⁵ violated Section 20.18(d) of the Rules by failing to fulfill these 481 PSAP requests within six months of the date of the request.

6. In light of T-Mobile's apparent willful and repeated violation of Section 20.18(d) of the Rules, we find that a forfeiture is warranted. Section 503(b)(1)(B) of the Communications Act of 1934, as amended, ("Act") states that any person who willfully or repeatedly fails to comply with any provision of the Act or any rule, regulation, or order issued by the Commission, shall be liable for a forfeiture penalty.¹⁶ Section 503(b)(2)(B) of the Act authorizes the Commission to assess a forfeiture of up to \$120,000 for each violation by a common carrier, or each day of a continuing violation, up to a statutory maximum of \$1,200,000 for a single act or failure to act.¹⁷ In determining the appropriate forfeiture amount, we must consider the factors enumerated in Section 503(b)(2)(D) of the Act, including "the nature, circumstances, extent and gravity of the violation, and, with respect to the violator, the degree of culpability, any history of prior offenses, ability to pay, and such other matters as justice may require."¹⁸

7. The Commission's *Forfeiture Policy Statement* and Section 1.80 of the Rules do not establish a base forfeiture amount for violation of Section 20.18(d) of the Rules.¹⁹ However, we think that a substantial proposed forfeiture for this violation is warranted. Violation of the E911 rules is extremely serious because these rules are intended to promote safety of life. The Phase I requirements set forth in Section 20.18(d) have been in effect for almost five years. Each unsatisfied PSAP request is a separate,

Systems, Fourth Memorandum Opinion and Order, CC Docket No. 94-102, 15 FCC Rcd 17442, 17461-64 (2000).

¹⁴ Section 312(f)(1) of the Act, 47 U.S.C. § 312(f)(1), which applies to forfeitures for which forfeitures are assessed under Section 503(b) of the Act, provides that "[t]he term 'willful,' ... means the conscious and deliberate commission or omission of such act, irrespective of any intent to violate any provision of this Act or any rule or regulation of the Commission authorized by this Act" See *Southern California Broadcasting Co.*, 6 FCC Rcd 4387 (1991) ("*Southern California*") (discussing legislative history regarding applicability of Section 312(f)(1) definition of "willful" to Section 503(b)).

¹⁵ Section 312(f)(2) of the Act, 47 U.S.C. § 312(f)(2), which also applies to forfeitures assessed pursuant to Section 503(b) of the Act, provides that "[t]he term 'repeated,' ... means the commission or omission of such act more than once or, if such commission or omission is continuous, for more than one day." See *Southern California*, 6 FCC Rcd at 4388.

¹⁶ 47 U.S.C. § 503(b)(1)(B); see also 47 C.F.R. § 1.80(a)(2).

¹⁷ 47 U.S.C. § 503(b)(2)(B); see also 47 C.F.R. § 1.80(b)(2).

¹⁸ 47 U.S.C. § 503(b)(2)(D); see also *The Commission's Forfeiture Policy Statement and Amendment of Section 1.80 of the Rules to Incorporate the Forfeiture Guidelines*, 12 FCC Rcd 17087, 17100 (1997) ("*Forfeiture Policy Statement*"), recon. denied, 15 FCC Rcd 303 (1999); 47 C.F.R. § 1.80(b)(4).

¹⁹ The fact that there is no established base forfeiture amount for this violation does not indicate that no forfeiture should be imposed. The *Forfeiture Policy Statement* states that "... any omission of a specific rule violation from the ... [forfeiture guidelines] ... should not signal that the Commission considers any unlisted violation as nonexistent or unimportant." *Forfeiture Policy Statement*, 12 FCC Rcd at 17099. The Commission retains the discretion, moreover, to depart from the *Forfeiture Policy Statement* and issue forfeitures on a case-by-case basis, under its general forfeiture authority contained in Section 503 of the Act. *Id.*

continuing violation of Section 20.18(d), and T-Mobile's numerous, continuing violations have been ongoing for as long as four years.

8. In addition, in the *Forfeiture Policy Statement*, the Commission made clear that companies with higher revenues, such as T-Mobile,²⁰ could expect forfeitures higher than those reflected in the base amounts:

[O]n the other end of the spectrum of potential violations, we recognize that for large or highly profitable communication entities, the base forfeiture amounts ... are generally low. In this regard, we are mindful that, as Congress has stated, for a forfeiture to be an effective deterrent against these entities, the forfeiture must be issued at a high level.... For this reason, we caution all entities and individuals that, independent from the uniform base forfeiture amounts ..., we intend to take into account the subsequent violator's ability to pay in determining the amount of a forfeiture to guarantee that forfeitures issued against large or highly profitable entities are not considered merely an affordable cost of doing business. Such large or highly profitable entities should expect in this regard that the forfeiture amount set out in a Notice of Apparent Liability against them may in many cases be above, or even well above, the relevant base amount.²¹

9. We believe that the factors cited above, particularly, the very large number of unfulfilled Phase I requests, the fact that each unfulfilled Phase I request is a separate, continuing violation, the public safety nature of the violations, and the fact that T-Mobile is a large company with substantial revenues, justify a substantial proposed forfeiture. We also believe, however, that the proposed forfeiture amount should take into account the fact that T-Mobile brought its violations of the Phase I rules to the Commission's attention in May 2002. Voluntary disclosure is a downward adjustment factor under the *Forfeiture Policy Statement*, and we think that T-Mobile's voluntary disclosure in this case should be accorded weight in mitigating the forfeiture amount.²² Considering all of the enumerated factors and the particular circumstances of this case, we conclude that T-Mobile is apparently liable for a forfeiture in the amount of \$1.25 million for its apparent willful and repeated violations of Section 20.18(d) of the Rules.²³

IV. CONCLUSION

10. We find that T-Mobile apparently willfully and repeatedly violated Section 20.18(d) by failing to fulfill 481 PSAP requests for Phase I service within six months of the date of the request. We also find that T-Mobile is apparently liable for a \$1.25 million forfeiture for these violations.²⁴

²⁰ T-Mobile reported that it had total revenues of \$3.99 billion in 2001. See T-Mobile International Reports Detailed Full Year 2001 and Fourth Quarter 2001 Results of VoiceStream (released March 4, 2002).

²¹ *Forfeiture Policy Statement*, 12 FCC Rcd at 17099-100. See also 47 U.S.C. § 503(b)(2)(D); 47 C.F.R. § 1.80(b)(4), Note to paragraph (b)(4): Section II. Adjustment Criteria for Section 503 Forfeitures.

²² *Forfeiture Policy Statement*, 12 FCC Rcd at 17099-100. See also 47 C.F.R. § 1.80(b)(4), Note to paragraph (b)(4): Section II. Adjustment Criteria for Section 503 Forfeitures.

²³ The statutory maximum for each of the continuing violations would be \$1.2 million. 47 U.S.C. § 503(b)(2)(B); see also 47 C.F.R. § 1.80(b)(2).

²⁴ The proposed forfeiture here covers the period dating back one year from the date of this *NAL*.

V. ORDERING CLAUSES

11. Accordingly, IT IS ORDERED that, pursuant to Section 503(b) of the Act, and Section 1.80 of the Rules, T-Mobile USA, Inc. is hereby NOTIFIED of this APPARENT LIABILITY FOR A FORFEITURE in the amount of One Million Two Hundred Fifty Thousand Dollars (\$1,250,000) for willful and repeated violations of Section 20.18(d) of the Rules.

12. IT IS FURTHER ORDERED that, pursuant to Section 1.80 of the Rules, within thirty days of the release date of this *Notice of Apparent Liability*, T-Mobile USA, Inc. SHALL PAY the full amount of the proposed forfeiture or SHALL FILE a written statement seeking reduction or cancellation of the proposed forfeiture.

13. Payment of the forfeiture may be made by mailing a check or similar instrument, payable to the order of the Federal Communications Commission, to the Forfeiture Collection Section, Finance Branch, Federal Communications Commission, P.O. Box 73482, Chicago, Illinois 60673-7482. The payment should note NAL/Acct. No. 200332100002 and FRN 0006-9459-50. Requests for payment of the full amount of this Notice of Apparent Liability under an installment plan should be sent to: Chief, Revenue and Receivables Operation Group, 445 12th Street, S.W., Washington, DC 20554.²⁵

14. The response if any must be mailed to Office of the Secretary, Federal Communications Commission, 445 12th Street, S.W., Washington, DC 20554, ATTN: Enforcement Bureau – Technical and Public Safety Division, and must include NAL/Acct. No. 200332100002.

15. The Commission will not consider reducing or canceling a forfeiture in response to a claim of inability to pay unless the petitioner submits: (1) federal tax returns for the most recent three-year period; (2) financial statements prepared according to generally accepted accounting practices; or (3) some other reliable and objective documentation that accurately reflects the petitioner's current financial status. Any claim of inability to pay must specifically identify the basis for the claim by reference to the financial documentation submitted.

²⁵ See 47 C.F.R. § 1.1914.

16. IT IS FURTHER ORDERED that a copy of this *Notice of Apparent Liability* shall be sent by first class mail and certified mail return receipt requested to Robert A. Calaff, Esq., Senior Corporate Counsel, Governmental and Industry Affairs, T-Mobile USA, Inc., 401 9th Street, N.W., Suite 550, Washington, D.C. 20004, and to John T. Nakahata, Esq., Harris, Wiltshire & Grannis, LLP, 1200 18th Street, N.W., Suite 1200, Washington, D.C. 20554.

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

APPENDIX A

State	County	PSAP Requesting Entity	Request Date
AL	Baldwin	Baldwin County Emergency Communications District	4/30/01
AL	Bullock	Bullock County E911	11/23/99
AL	Butler	Butler County Emergency Communications District	12/12/00
AL	Coffee	City of Enterprise	2/2/01
AL	Houston	Dothan-Houston County Communications District	4/9/01
AL	Jefferson	City of Hoover Police Department	9/27/01
AL	Jefferson	City of Hueytown	5/8/01
AL	Jefferson	City of Irondale Police Department	11/16/01
AL	Macon	Macon County 9-1-1 Board	10/1/01
AL	Marion	Marion County E9-1-1	11/14/00
AL	Mobile	Mobile County Communications District	3/30/01
AL	Morgan	Morgan County Emergency Management Communications District	12/14/99
AL	Sumter	Sumter County EMA/E911	2/28/01
AR	Garland	Garland County Department of Emergency Management	2/15/02
AR	Pulaski	Pulaski County Sheriff's Office	2/14/02
AR	Washington	Washington County Department of Emergency Management	1/16/02
AZ	Maricopa	Maricopa County E9-1-1 System	5/31/00
CO	Adams	Adams County E-911	3/15/98
CO	Arapahoe	Arapahoe County E-911 Authority Board	9/1/98
CO	Arapahoe	City of Aurora	9/1/98
CO	Boulder	Boulder Regional Emergency Telephone Service Authority	3/28/00
CO	Denver	City and County of Denver	6/23/97
CO	Douglas	Douglas County Emergency Telephone Service Authority	3/1/98
CO	Eagle	Eagle County Telephone Service Authority	4/5/99
CO	Gilpin	Gilpin County 911 Authority Board	1/15/99
CO	Jefferson	Jefferson County E911 ESTAB	6/23/99
CO	Larimer	Larimer County Telephone Authority	5/4/99
CO	Pitkin	Aspen-Pitkin County Communications Center	8/29/01
CO	Summit	Summit County Communications Center	2/2/99
CO	Weld	Weld County E-911	3/3/98
DE	DE-Multiple	State of Delaware	10/11/01
DE	Kent	Kent County	10/11/01
FL	Alachua	Alachua County Department of Fire/Rescue Services	6/5/00
FL	Bay	Bay County	3/21/01
FL	Brevard	Brevard County	4/27/00
FL	Citrus	Citrus County	10/31/00
FL	Duval	Duval County 9-1-1 Emergency Telephone System	10/9/01
FL	Escambia	Escambia County Department of Public Safety	9/29/00
FL	Flagler	Flagler County	9/22/01
FL	Hamilton	Hamilton County	3/17/97
FL	Hernando	Hernando County	10/24/00
FL	Hillsborough	Hillsborough County	10/3/00
FL	Holmes	Holmes County 911	3/2/01
FL	Lake	Lake County 911	5/1/99

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FL Leon Leon County Sheriff's Office 10/27/00
(cont'd)

<u>State</u>	<u>County</u>	<u>PSAP Requesting Entity</u>	<u>Request Date</u>
FL	Manatee	Manatee County	12/8/00
FL	Marion	Marion County 911 System Support Department	7/25/00
FL	Okaloosa	Okaloosa County 911	6/22/01
FL	Orange	Orange County	5/3/00
FL	Osceola	Osceola County	9/21/00
FL	Pasco	Pasco County	10/9/00
FL	Pinellas	Pinellas County	6/28/00
FL	Polk	Polk County	8/11/99
FL	Santa Rosa	Santa Rosa County E9-1-1	11/30/00
FL	Sarasota	Sarasota County	6/30/99
FL	Seminole	Seminole County	5/1/00
FL	St. Johns	St. Johns County Sheriff's Office	7/5/01
FL	Sumter	Sumter County	4/12/00
FL	Taylor	Taylor County Sheriff's Office	3/19/01
FL	Volusia	Volusia County	1/31/01
GA	Bibb	Macon-Bibb County 911 Center	1/13/99
GA	Chatham	Chatham County Finance Department	1/9/02
GA	Clarke	Athens-Clarke County 911	12/22/98
GA	Clayton	City of Morrow Emergency Communications	9/22/00
GA	Fulton	Alpharetta	7/8/99
GA	Fulton	Atlanta Police Department	1/5/00
GA	Houston	Houston County Commissioners	7/7/00
GA	Jackson	Jackson County E-911	8/19/98
GA	Lamar	Lamar County 9-1-1 District	7/31/98
GA	McDuffie	McDuffie County E9-1-1 Communications Center	12/7/98
GA	Rockdale	Rockdale County	7/30/98
ID	Ada	Ada County Sheriff's Office	4/3/01
IL	Boone	Boone County Emergency Telephone System Board	5/22/01
IL	Bureau	Bureau County E 9-1-1	11/29/01
IL	Cook	Alsip Police Department	11/15/00
IL	Cook	Barrington Hills 9-1-1	7/7/00
IL	Cook	Bellwood ETSB	3/29/01
IL	Cook	Berkeley ETSB	7/18/01
IL	Cook	Blue Island 9-1-1	8/15/01
IL	Cook	Broadview ETSB	11/21/00
IL	Cook	Chicago Heights	1/31/01
IL	Cook	Cicero 9-1-1 ETSB	1/24/01
IL	Cook	City of Chicago	7/31/00
IL	Cook	Country Club Hills Police Department	12/5/00
IL	Cook	Countryside Police Department	3/22/01
IL	Cook	Des Plaines-Park Ridge Emergency Communications	10/28/00
IL	Cook	Elmwood Park Public Safety	8/27/01
IL	Cook	Evergreen Park Police Department	11/17/00
IL	Cook	Forest Park ETSB	11/1/01

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IL Cook Franklin Park ETSB 8/22/01
(cont'd)

State	County	PSAP Requesting Entity	Request Date
IL	Cook	Glencoe 9-1-1	8/22/01
IL	Cook	Glenwood Police Department	12/5/00
IL	Cook	Indian Head Park Police Department	11/8/00
IL	Cook	Kenilworth Police Department	4/2/01
IL	Cook	La Grange Police Department	11/13/00
IL	Cook	Lincolnwood ETSB	11/8/00
IL	Cook	Lynwood & Thorton's ETSB	11/13/00
IL	Cook	McCook ETSB	1/10/01
IL	Cook	Midlothian Police Department	11/28/00
IL	Cook	Morton Grove Police Department	1/9/01
IL	Cook	Niles ETSB	4/18/01
IL	Cook	Norridge 9-1-1	1/2/01
IL	Cook	Oak Lawn Emergency Communications	11/28/00
IL	Cook	Orland Joint Emergency Telephone System Board	8/28/00
IL	Cook	Park Forest ETSB	10/30/00
IL	Cook	River Grove Police Department	4/12/01
IL	Cook	Riverdale ETSB	10/25/00
IL	Cook	Rolling Meadows Police Department	8/31/00
IL	Cook	Schaumburg Police Department	11/13/00
IL	Cook	Schiller Park 9-1-1 Board	10/17/00
IL	Cook	Skokie Police/Fire Communication Center	6/1/01
IL	Cook	South Holland ETSB	11/27/00
IL	Cook	SOUTHCOM	9/14/01
IL	Cook	Southwest Central 9-1-1 System	9/6/00
IL	Cook	Tinley Park ETSB	11/27/00
IL	Cook	Western Suburban Consolidated Dispatch	1/3/01
IL	Cook	Willow Springs 9-1-1 System	2/21/01
IL	Cook	Wilmette Police Department	10/30/00
IL	Cook	Winnetka Police Department	4/5/01
IL	DuPage	DuPage County Emergency Telephone System Board	8/1/00
IL	Effingham	Effingham County ETSB	11/17/00
IL	Ford	Ford County ETSB	11/8/00
IL	Jefferson	Jefferson County ETSB	12/17/01
IL	Kane	Elgin ETSB	5/26/00
IL	Kane	Kane County ETSB	5/19/00
IL	Kane	QuadCom Joint Telephone System Board	5/22/00
IL	Kankakee	Kankakee ETSB	7/28/00
IL	Kendall	Kendall County ETSB-KENCOM Public Safety Dispatch	5/25/00
IL	Lake	CenCom E911	9/19/01
IL	Lake	Deerfield Police Department 9-1-1	3/6/01
IL	Lake	Gurnee Police Department	10/5/00
IL	Lake	Highland Park E9-1-1	3/7/01
IL	Lake	Lake Bluff 9-1-1	5/7/01
IL	Lake	Lake County ETSB	3/6/01

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IL Lake Libertyville Police Department 8/14/01
(cont'd)

State	County	PSAP Requesting Entity	Request Date
IL	Lake	Mundelein Police Department	11/6/00
IL	Lake	Vernon Hills Police Department	6/12/01
IL	Lake	Winthrop Harbor ETSB	3/14/01
IL	Lake	Zion E911 ETSB	2/16/01
IL	Lee	Lee County ETSB	10/14/00
IL	Madison	Madison County ETSB	10/2/00
IL	McHenry	McHenry County ETSB	2/26/02
IL	Morgan	Morgan County E911	2/27/01
IL	Ogle	Ogle County ETSB	12/14/00
IL	Peoria	Peoria County ETSB	7/28/00
IL	Piatt	Piatt County ETSB	10/12/00
IL	Sangamon	Sangamon County ETSB	9/5/00
IL	Tazewell	Tazewell County ETSB	10/2/00
IL	Vermilion	Vermilion County ETSB	9/19/00
IL	Will	Bolingbrook Police Department	12/4/00
IL	Will	Will County 9-1-1 Emergency Telephone System	7/6/00
IL	Williamson	Williamson County 9-1-1	2/20/02
IL	Winnebago	Winnebago County ETSB	10/18/00
IN	Adams	Adams County	1/14/02
IN	Allen	Allen County	2/2/01
IN	Bartholomew	Bartholomew County	4/23/99
IN	Carroll	Carroll County	4/9/01
IN	Cass	Cass County Enhanced 911	11/2/01
IN	Clark	Clark County Public Safety	9/30/97
IN	Clay	Clay County E-911 Office	2/6/00
IN	Clinton	Clinton County 911	10/2/01
IN	Daviess	Daviess County	8/31/01
IN	DeKalb	DeKalb County Sheriff Department	11/12/98
IN	Dearborn	Dearborn County Communications	11/7/01
IN	Decatur	Decatur County	2/1/99
IN	Delaware	Delaware County	6/21/01
IN	Elkhart	Elkhart County	3/11/99
IN	Floyd	New Albany Police Department	9/29/97
IN	Grant	Grant County	1/10/01
IN	Hamilton	Carmel Communications	2/3/99
IN	Hamilton	Hamilton County	2/3/99
IN	Hamilton	Noblesville Communications	2/3/99
IN	Hancock	Hancock County	1/31/01
IN	Hendricks	Hendricks County	6/18/01
IN	Henry	Henry County Sheriff's Department	12/10/01
IN	Howard	Howard County	3/25/99
IN	Huntington	Huntington County Communications	1/23/01
IN	Jefferson	Jefferson County	4/20/01
IN	Johnson	Johnson County Sheriff's Department	1/2/02

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IN Knox Knox County Dispatch 10/23/01
(cont'd)

State	County	PSAP Requesting Entity	Request Date
IN	Kosciusko	Kosciusko County	7/13/00
IN	LaGrange	LaGrange County	1/18/01
IN	Lake	Lake County	11/9/00
IN	LaPorte	LaPorte County	12/4/00
IN	Madison	Madison County	4/17/01
IN	Marion	Metropolitan Emergency Communications Agency	3/8/02
IN	Miami	Miami County	7/12/00
IN	Monroe	Bloomington/Monroe County Indiana Central Emergency	8/23/01
IN	Montgomery	Montgomery County	9/13/01
IN	Perry	Perry County 911 Communications	2/7/02
IN	Porter	Porter County	11/5/01
IN	Posey	Posey County E911	Unknown
IN	Putnam	Putnam County 911	11/7/01
IN	Ripley	Ripley County Communications	4/11/01
IN	Scott	Scott County Emergency Management Agency	1/22/01
IN	Spencer	Spencer County Sheriff's Department	12/14/01
IN	St. Joseph	St. Joseph County Police	2/25/02
IN	Starke	Starke County	1/18/01
IN	Steuben	Steuben County Communications	3/22/99
IN	Tippecanoe	Tippecanoe County Sheriff's Department	3/25/02
IN	Tipton	Tipton County E 9-1-1 Communications Center	10/19/01
IN	Vanderburgh	EVCC Central Dispatch	1/16/02
IN	Vigo	Vigo County	9/21/00
IN	Warrick	Warrick County	1/4/01
IN	Wayne	Wayne County Emergency Communications Department	11/2/01
IN	Wells	City of Bluffton	11/2/01
IN	Whitley	Whitley County Enhanced 9-1-1	10/10/00
KS	Johnson	Johnson County Sheriff's Office	11/9/01
KS	Johnson	Leawood Police Department	11/9/01
KS	Johnson	Lenexa Police Department	11/9/01
KS	Johnson	Olathe Police Department	11/9/01
KS	Johnson	Overland Park Police Department	11/9/01
KS	Johnson	Prairie Village Police Department	11/9/01
KS	Johnson	Shawnee Police Department	11/9/01
KS	Leavenworth	Ft. Leavenworth Provost Marshall	11/9/01
KS	Leavenworth	Leavenworth County Sheriff's Office	11/9/01
KS	Leavenworth	Leavenworth Police Department	11/9/01
KS	Riley	Riley County Emergency Management	10/1/01
KS	Sedgwick	Sedgwick County Department of Emergency Communications	7/25/01
KS	Wyandotte	Wyandotte Public Safety Communications Center	11/9/01
KY	Anderson	Anderson County/Lawrenceburg Police Department	2/28/01
KY	Barren	Barren/Metcalf County Emergency Communications Center	6/20/01
KY	Bourbon	Paris, Bourbon County E-911 and Central Communications	12/1/00
KY	Boyle	Danville-Boyle County Enhanced 911	3/30/01

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KY Campbell Campbell County 11/7/01
(cont'd)

<u>State</u>	<u>County</u>	<u>PSAP Requesting Entity</u>	<u>Request Date</u>
KY	Clark	Clark County	11/14/00
KY	Fayette	Lexington-Fayette Urban County Government	11/14/00
KY	Hardin	Hardin County	7/6/00
KY	Harrison	Cynthiana/Harrison County E911	12/8/00
KY	Kenton	Kenton County	11/29/01
KY	KY-Multiple	KSP-Post 1 Mayfield	5/1/01
KY	KY-Multiple	KSP-Post 2 Madisonville	5/1/01
KY	KY-Multiple	KSP-Post 3 Bowling Green	5/1/01
KY	KY-Multiple	KSP-Post 4 Elizabethtown	5/1/01
KY	KY-Multiple	KSP-Post 5 Lagrange	5/1/01
KY	KY-Multiple	KSP-Post 7 Richmond	5/1/01
KY	KY-Multiple	KSP-Post 11 London	5/1/01
KY	KY-Multiple	KSP-Post 12 Frankfurt	5/1/01
KY	KY-Multiple	KSP-Post 14 Ashland	5/1/01
KY	KY-Multiple	KSP-Post 16 Henderson	5/1/01
KY	Laurel	London-Laurel County Communications Center	11/16/00
KY	Madison	Madison County 911	2/28/01
KY	McCracken	Paducah-McCracken County E-911 Communications Services	3/20/02
KY	Mercer	Mercer County 911	4/30/01
KY	Shelby	Shelby County E-911 Board	12/11/00
KY	Warren	Bowling Green Police	6/14/00
KY	Washington	Washington County/City of Springfield PSAP Board	11/21/00
KY	Woodford	Woodford County	12/3/01
MA	MA-Multiple	State of Massachusetts	9/26/01
MD	Anne Arundel	Anne Arundel County	5/15/00
MI	Allegan	Allegan County Central Dispatch	9/1/00
MI	Bay	Bay County 911 Central Dispatch	9/1/00
MI	Branch	Branch County Central Dispatch	4/30/01
MI	Calhoun	Calhoun County Sheriff's Department	1/23/01
MI	Clinton	Clinton	5/19/00
MI	Eaton	Eaton County Central Dispatch	9/1/00
MI	Genesee	Genesee County 911 Authority	9/1/00
MI	Hillsdale	Hillsdale County Central Dispatch	9/1/00
MI	Ingham	East Lansing Police Department	4/13/01
MI	Ingham	Ingham County	4/26/01
MI	Ionia	Ionia County Central Dispatch	9/1/00
MI	Jackson	Jackson County Sheriff's Department	3/29/01
MI	Kalamazoo	Kalamazoo County	3/20/01
MI	Kent	Grand Rapids Police Department	4/24/01
MI	Kent	Kent	5/23/01
MI	Lapeer	Lapeer County Central Dispatch	9/1/00
MI	Lenawee	Lenawee	11/14/00
MI	Macomb	Macomb County	9/1/00
MI	Monroe	Monroe County Central Dispatch	9/1/00

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MI	Montcalm	Montcalm County Central Dispatch Authority	9/1/00
(cont'd)			

State	County	PSAP Requesting Entity	Request Date
MI	Muskegon	Muskegon	5/2/00
MI	Ottawa	Ottawa County Central Dispatch Authority	9/1/00
MI	Saginaw	Saginaw County 911 Communications Center	9/1/00
MI	Shiawassee	Shiawassee	6/21/00
MI	St. Clair	St. Clair County	3/6/01
MI	St. Joseph	St. Joseph County E911 Central Dispatch	11/13/01
MI	Van Buren	Van Buren County	4/12/01
MI	Washtenaw	Washtenaw Central Dispatch Authority	9/1/00
MI	Wayne	City of Detroit Police Department	3/21/01
MI	Wayne	Conference of Eastern Wayne	9/20/00
MI	Wayne	Downriver Mutual Aid Service District	4/10/01
MN	Aitkin	Aitkin County Sheriff's Office	1/10/01
MN	Anoka	Anoka County Central Communications	1/10/01
MN	Benton	Benton County Sheriff's Office	1/10/01
MN	Blue Earth	Blue Earth County	1/10/01
MN	Brown	Brown County Sheriff's Department	1/10/01
MN	Carlton	Carlton County Sheriff's Office	1/10/01
MN	Carver	Carver County Sheriff's Department	1/10/01
MN	Cass	Cass County Sheriff's Office	1/10/01
MN	Chisago	Chisago County Sheriff's Office	1/10/01
MN	Clay	Clay County 911	1/10/01
MN	Crow Wing	Crow Wing County Sheriff's Office	1/10/01
MN	Dakota	Apple Valley Police Department	1/10/01
MN	Dakota	Burnsville Police Department	1/10/01
MN	Dakota	Dakota County Sheriff's Department	1/10/01
MN	Dakota	Eagen	1/10/01
MN	Dakota	Lakeville Police Department	1/10/01
MN	Dodge	Dodge County Sheriff's Office	1/10/01
MN	Douglas	Douglas County	1/10/01
MN	Faribault	Faribault County	1/10/01
MN	Freeborn	Freeborn County Law Enforcement Center	1/10/01
MN	Goodhue	Goodhue County Sheriff's Office	1/10/01
MN	Grant	Grant County	1/10/01
MN	Hennepin	Bloomington Police Department	1/10/01
MN	Hennepin	Brooklyn Center Police Department	1/10/01
MN	Hennepin	City of St. Louis Park Police Department	1/10/01
MN	Hennepin	Eden Prairie Police Department	1/10/01
MN	Hennepin	Edina Police Department	1/10/01
MN	Hennepin	Hennepin County Sheriff's Office-Communications	1/10/01
MN	Hennepin	Hopkins Police Department	1/10/01
MN	Hennepin	Minneapolis Police Department	1/10/01
MN	Hennepin	Minneapolis St. Paul International Airport	1/10/01
MN	Hennepin	Minnetonka Police Department	1/10/01
MN	Hennepin	Richfield Police Department	1/10/01

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State	County	PSAP Requesting Entity	Request Date
MN	Isanti	Isanti County Sheriff's Office	1/10/01
(cont'd)			
MN	Jackson	Jackson County	1/10/01
MN	Kanabec	Kanabec County Sheriff's Office	1/10/01
MN	Kandiyohi	Kandiyohi County Sheriff's Department	1/10/01
MN	Le Sueur	Le Sueur County Sheriff's Office	1/10/01
MN	Martin	Martin County	1/10/01
MN	McLeod	McLeod County Sheriff's Department	1/10/01
MN	Meeker	Meeker County Sheriff's Department	1/10/01
MN	Mille Lacs	Mille Lacs County Sheriff's Office	1/10/01
MN	MN-Multiple	St. Paul	1/10/01
MN	Morrison	Morrison County Sheriff's Office	1/10/01
MN	Mower	Mower County-Law Enforcement Center Austin Police	1/10/01
MN	MSP	MSP East	1/10/01
MN	Nicollet	Nicollet County Sheriff's Office	1/10/01
MN	Nobles	Nobles County	1/10/01
MN	Olmsted	Olmsted County Law Enforcement Center	1/10/01
MN	Otter Tail	Otter Tail County	1/10/01
MN	Pine	Pine County Sheriff's Office	1/10/01
MN	Ramsey	Maplewood Police Department	1/10/01
MN	Ramsey	White Bear Lake Police Department	1/10/01
MN	Rice	Rice County-Pearl Street 911 Center	1/10/01
MN	Rock	Rock County	1/10/01
MN	Scott	Scott County Sheriff's Department	1/10/01
MN	Sherburne	Sherburne County Sheriff's Office	1/10/01
MN	Sibley	Sibley County Sheriff's Office	1/10/01
MN	St. Louis	St. Louis County Emergency Communications Department	1/10/01
MN	Stearns	Stearns County Sheriff's Office	1/10/01
MN	Steele	Steele County-Pearl Street 911 Center	1/10/01
MN	Todd	Todd County	1/10/01
MN	Waseca	Waseca County Sheriff's Office	1/10/01
MN	Washington	Washington County Sheriff's Department	1/10/01
MN	Watonwan	Watonwan County	1/10/01
MN	Wilkin	Wilkin County	1/10/01
MN	Wright	Wright County Sheriff's Office	1/10/01
MO	Boone	City of Columbia/Boone County Joint Communications	3/15/02
MO	Cass	Belton Police Department	11/9/01
MO	Cass	Cass County Sheriff's Office	11/9/01
MO	Cass	Harrisonville Police Department	11/9/01
MO	Cass	Pleasant Hill Police Department	11/9/01
MO	Cass	Raymore Police Department	11/9/01
MO	Clay	Clay County Sheriff	11/9/01
MO	Clay	Gladstone Police Department	11/9/01
MO	Clay	Kansas City Police Department	11/9/01
MO	Clay	Liberty Police Department	11/9/01
MO	Clay	North Kansas City Police Department	11/9/01

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MO Clay Pleasant Valley Police Department 11/9/01
(cont'd)

<u>State</u>	<u>County</u>	<u>PSAP Requesting Entity</u>	<u>Request Date</u>
MO	Cooper	Cooper County EMA/9-1-1	10/29/00
MO	Franklin	Franklin County Emergency Management Agency	1/31/02
MO	Jackson	Blue Springs Police Department	11/9/01
MO	Jackson	Grandview Police Department	11/9/01
MO	Jackson	Independence Emergency Communications Center	11/9/01
MO	Jackson	Jackson County Sheriff	11/9/01
MO	Jackson	Lee's Summit Police Department	11/9/01
MO	Jackson	Raytown Police Department	11/9/01
MO	Jackson	Sugar Creek Police Department	11/9/01
MO	Jasper	Jasper County Communications Center	11/26/02
MO	Johnson	Johnson County Sheriff's Office	11/9/01
MO	Platte	Platte County Sheriff's Department	11/9/01
MO	Ray	Ray County 9-1-1	11/9/01
MO	St. Louis	St. Louis County	12/8/00
MO	Taney	Taney County 911 Administration	7/23/01
MO	Warren	Warren County 9-1-1	7/19/01
MS	Covington	Covington County E-911	3/13/01
MS	DeSoto	DeSoto Sheriff's Office	11/9/98
MS	Forrest	Forrest County Sheriff's Office	5/14/98
MS	Itawamba	Itawamba County E-911	4/1/97
MS	Jackson	Jackson County Emergency Communications District	12/19/00
MS	Lowndes	The Emergency Management District	5/14/98
MS	Marion	Marion County 911	3/14/01
MS	Panola	Panola County Civil Defense	10/11/00
MS	Rankin	Rankin County	1/1/01
MS	Tunica	Tunica County Planning Commission	8/2/99
MS	Warren	Vicksburg-Warren E-911 Communications Center	3/5/01
NE	Douglas	Douglas County Communications Department	6/14/01
NE	Hall	Grand Island-Hall County 9-1-1 Service District	1/15/02
NE	Lancaster	Lincoln/Lancaster County	6/18/01
NE	Madison	City of Norfolk	9/13/01
NE	Sarpy	Sarpy County	5/14/01
NJ	NJ-Multiple	State of New Jersey-OETS	1/1/00
NM	Dona Ana	Mesilla Valley Regional Dispatch Authority	8/7/01
NY	Cattaraugus	Cattaraugus County Sheriff's Office	1/29/02
NY	Erie	County of Erie	3/21/02
NY	Livingston	Livingston County	2/27/02
NY	Nassau	Nassau County PD	10/10/98
NY	New York	New York Police Communications	7/30/01
NY	Onondaga	Onondaga County Department of Emergency Communications	4/3/01
NY	Ontario	Ontario County 9-1-1	1/24/02
NY	Schenectady	New York State Police-Schenectady County	11/21/01
NY	Suffolk	County of Suffolk Police Department	3/13/01
OH	Delaware	Delaware County Emergency Services	7/12/01

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OH Hamilton Cincinnati 9-1-1 4/19/01
(cont'd)

State	County	PSAP Requesting Entity	Request Date
OH	Hamilton	Hamilton County	9/20/01
OH	Hocking	Hocking County 911	3/11/02
OH	Miami	Miami County Communications Center	7/23/01
OR	OR-Multiple	Oregon 911 Program	6/16/00
PA	Berks	Berks County	1/10/02
PA	Delaware	Delaware County Emergency Services	5/11/01
PA	Erie	Erie County 911 Center	12/5/01
PA	Pike	Pike County Communications Center	6/22/01
SC	Aiken	Aiken County Planning & Development Department	7/26/99
SD	Minnehaha	Minnehaha Metro Communications	12/20/01
TN	Bradley	Bradley County	4/1/01
TN	Gibson	Gibson County Communications Center	4/1/01
TN	Hardin	Hardin County	4/23/01
TN	Lincoln	Lincoln County	4/3/01
TN	Putnam	Putnam County	4/1/01
TX	Austin	Austin County Emergency Communications District	1/11/02
TX	Bexar	Bexar Metro 9-1-1 Network District	5/1/00
TX	Brazos	Brazos County Emergency Communications District	8/18/00
TX	Callahan	Callahan County	8/13/01
TX	Clay	Clay County Sheriff's Department	8/16/01
TX	Collin	City of Plano	9/11/01
TX	Dallas	City of Addison Police Department	1/8/01
TX	Dallas	City of Dallas Police & Fire Department	1/12/00
TX	Dallas	City of Farmers Branch	1/8/01
TX	Dallas	City of Garland Telecommunications	6/23/00
TX	Dallas	City of Mesquite Police Department	7/18/00
TX	Dallas	Dallas County Sheriff's Office	12/27/01
TX	Dimmit	Dimmit County	1/26/00
TX	Eastland	Eastland County	8/13/01
TX	Ector	Ector County Emergency Communications District	9/28/01
TX	El Paso	El Paso County 911 District	8/16/00
TX	Gregg	City of Longview	1/31/01
TX	Harris	Greater Harris County 9-1-1 Emergency Network	9/18/97
TX	Howard	Howard County 9-1-1	11/13/01
TX	Llano	Llano County	8/16/01
TX	Lubbock	Lubbock Emergency Communications District	9/17/01
TX	Matagorda	Matagorda County Sheriff's Department	2/9/00
TX	Midland	Midland Emergency Communications District	9/26/01
TX	Montague	Montague County	8/16/01
TX	Smith	Smith County 9-1-1 Communications District	1/26/00
TX	Tarrant	Tarrant County 911 District	8/24/00
UT	Salt Lake	Valley Emergency Communications Center	6/28/97
UT	Weber	Weber County Communications	3/10/97
VA	Albemarle	Albemarle County Emergency Communications Center	8/21/01

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VA Alexandria Alexandria Police Department 7/12/01
(cont'd)

<u>State</u>	<u>County</u>	<u>PSAP Requesting Entity</u>	<u>Request Date</u>
VA	Arlington	Arlington County Emergency Communications Center	7/12/01
VA	Chesapeake	City of Chesapeake	2/7/02
VA	Chesterfield	Chesterfield County 9-1-1	10/19/01
VA	Colonial Hgts	City of Colonial Heights	3/7/02
VA	Dinwiddie	Dinwiddie County Sheriff's Office	10/19/01
VA	Fairfax	Fairfax Police Department	7/12/01
VA	Fauquier	Warrenton-Fauquier Joint Communications Center	7/5/01
VA	Frederick	Frederick County	3/21/02
VA	Hampton City	Hampton City	2/7/02
VA	James City	James City County	2/7/02
VA	Loudoun	Loudoun County 9-1-1	7/12/01
VA	New Kent	New Kent County Sheriff's Office	11/5/01
VA	Newport News	City of Newport News	2/7/02
VA	Norfolk City	City of Norfolk	2/7/02
VA	Petersburg	City of Petersburg	10/10/01
VA	Poquoson City	City of Poquoson	2/7/02
VA	Prince George	Prince George County Police	12/10/01
VA	Prince William	Prince William County	7/12/01
VA	Stafford	Stafford County Sheriff's Office	10/19/01
VA	Virginia Beach	City of Virginia Beach	1/31/02
WA	Adams	Adams County Sheriff's Office	8/17/01
WA	Cowlitz	Cowlitz County TSC	5/2/00
WA	Island	Island County Emergency Service Communications Center	4/11/00
WA	Jefferson	Jefferson County Sheriff's Office	3/27/00
WA	King	King County E911	2/17/00
WA	Lewis	Lewis County 9-1-1 Communications	4/26/00
WA	Pierce	Pierce County E 9-1-1 Program	6/19/00
WA	San Juan	San Juan County E9-1-1	5/2/00
WA	Skagit	Skagit County 911	2/24/00
WA	Snohomish	Snohomish County Emergency Services	2/22/00
WA	Spokane	Spokane County 911 Communications	4/19/00