SEPARATE STATEMENT OF COMMISSIONER MICHAEL J. COPPS

Re: Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911
Emergency Calling Systems (CC Docket No. 94-102); and Amendment of Parts 2 and 25
to Implement the Global Mobile Personal Communications by Satellite (MPCS)
Memorandum of Understanding and Arrangements; Petition of the National
Telecommunications and Information Administration to Amend Part 25 of the
Commission's Rules to Establish Emissions Limits for Mobile and Portable Earth
Stations Operating in the 1610-1660.5 MHz Band (IB Docket No. 99-67).

I'm pleased that we're addressing some of the potential gaps in our 911 system in this important Order, and that we are clarifying the responsibilities of a wide range of parties.

The responsibilities of multi-line telephone system operators are of particular concern for me. This is one of our public safety community's top public safety issues, and we need to determine what can be done to bring adequate E911 services to Americans who work in the large offices where MLTS are present. This may well be a place for more federal action. Today, in an FNPRM, we seek to bolster our record on the nature of this problem, the technologies involved, and our jurisdiction. I strongly encourage the public safety community and MLTS operators to file specific and thorough comments on these issues. Without their help, we cannot properly address this challenge.

Finally, I note that as the Commission continues its examination of IP telephony, we must keep 911 issues in mind. We need to find a way to allow this technology to bring much needed new competition to our consumers without undermining the ubiquity of our 911 system.