



In the Matter of the Commission, on its)
Own motion, seeking to investigate and)
Establish policies and procedures for the)
Filing and auditing of enhanced wireless)
911 quarterly reports pursuant to *Neb.*)
Rev. Stat. § 86-859.)

Application No. 911-053/PI-180

COMMENTS OF CELLCO PARTNERSHIP
d/b/a VERIZON WIRELESS, SPRINT NEXTEL and NEW CINGULAR
WIRELESS PCS, LLC d/b/a AT&T MOBILITY

These brief comments are in response to the Commission’s Order Opening Docket and Seeking Comment dated July 12, 2011 (the “Order”). They are provided by Cellco Partnership d/b/a Verizon Wireless, New Cingular Wireless PCS, LLC d/b/a AT&T Mobility and Sprint Spectrum L.P., Nextel West Corp., and NPCR, Inc. (collectively, Sprint Nextel), collectively referred to herein as the “Wireless Carriers”.

The Order indicates that the Commission opened this docket to investigate and establish policies and procedures for the filing and auditing of enhanced wireless 911 quarterly reports that are required of wireless carriers pursuant to *Neb. Rev. Stat.* § 86-459(2). More specifically, the Order states that the Commission’s intention is to establish a policy and procedure for the submission of supporting documentation to the Commission for its review of quarterly reports.

The Wireless Carriers request that before proceeding and before it can meaningfully and efficiently respond to the Commission order, the Commission should first schedule workshops or conversations among the wireless carriers and the Commission staff to discuss the subject of the Order and the perceived problems it seeks to solve. The current quarterly reporting process is already time consuming and burdensome and,

therefore, before adding additional reporting and documentation requirements, it seems beneficial to explore ways to simplify the current report. In addition, because the Order did not identify any problems that may have prompted the proposal to increase filing requirements, informal workshops may enable the Commission and the industry to better identify issues and develop a targeted, jointly agreeable proposal or solution that can resolve any problems, minimizing or avoiding altogether the imposition of additional burdens.

While the answers to the specific requests of the Order will likely vary among the carriers, what is common to all the wireless carriers is the fact that researching and retrieving the information necessary to prepare the quarterly reports is extremely time consuming, burdensome and requires the support of several different persons and subject areas within each carrier and involves documents or data bases of several different types. Just as it does in the preparation of other filings, the Wireless Carriers pull data from several sources but do not then accumulate or “store” all the relevant back up documentation or information in a single data base that can be provided electronically to the Commission. In the event of an inquiry from the Commission with respect to any aspect of a quarterly report, the Wireless Carriers again access the specific relevant individual data or information source to document and respond with respect to the specific inquiry.

To our knowledge this process has enabled timely response to inquiries. This process is also entirely consistent with the process envisioned by the enabling statute, § 86-459(3). Under the statute, wireless carriers must comply with a record-retention requirement which, as the Commission notes, requires carriers “to maintain records for a

period of five (5) years.” Order, at 1. Additionally, the statute allows the Commission to audit “any wireless carrier's books and records concerning the collection and remittance of any amounts collected pursuant to the Enhanced Wireless 911 Services Act.” In sum, the statutory scheme contemplates that carrier compliance can be assured by pairing a document retention requirement with an audit enforcement tool. On the other hand, the proposal to require that all wireless carriers submit detailed supporting documentation with every quarterly report filed is inconsistent with this statute. Again, any instances that might indicate some change is needed, along with ways to reduce the current reporting burden could be discussed in workshops or conversations among the interested parties and staff so that targeted efficient solutions may be developed.

Again, thank you for this opportunity for input and for attention to our concerns. We look forward to meaningful dialogue.

Respectfully submitted this 19th day of August, 2011.

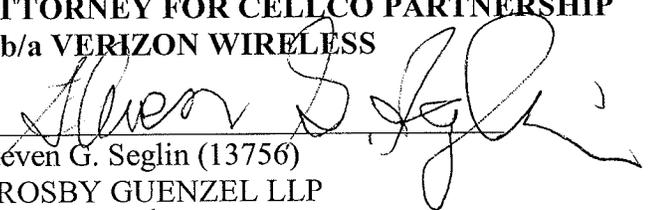
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