

**BEFORE THE NAVAJO NATION
TELECOMMUNICATIONS REGULATORY COMMISSION**

**IN THE MATTER OF NAVAJO)
NATION 911 SERVICE AND PUBLIC)
SAFETY ANSWERING POINT)
(PSAP))**

DOCKET NO. NNTRC-12-001

COMMENTS ON NOTICE OF INQUIRY OF NTUA WIRELESS, LLC

On November 9, 2012, the Navajo Nation Telecommunications Regulatory Commission (“NNTRC”) adopted its Notice of Inquiry in this matter (“Notice”). The Notice was adopted following reports to the Law and Order Committee of the Navajo Nation Council (the “Committee”) with respect to the current status of the Navajo Nation’s emergency calling response system. As a result of those reports to the Committee, the Committee recommended that the Office of the President create an action plan to address the lack of E911 services on the Navajo Nation. Among other related findings, the NNTRC indicated that it is opening this inquiry “in order to facilitate the effective implementation of oversight, funding, construction, development and administration of one or more PSAPs on the Navajo Nation, and their associated Service Plans.” Notice pages 2 and 3. The Notice sets forth several specific questions, with respect to which the NNTRC seeks comments and input.

NTUA Wireless, LLC (“NTUA Wireless”), a partnership of the Navajo Tribal Utility Authority (“NTUA”) and Commnet Wireless, LLC, submits the following comments and input with respect to certain questions posed in the Notice and provides a recommendation for how to proceed in this matter. In summary, NTUA Wireless recommends that following the initial round of comments and input, that the NNTRC establish a working group comprised of carriers (both wireline and wireless), NNTRC representatives and an independent expert with respect to 911 deployment and administration. The working group, following careful study and

consideration, should provide a set of recommendations to the NNTRC that could then be noticed for comment to all stakeholders before the NNTRC proceeds in this important matter.

NTUA Wireless supports NNTRC efforts to protect the public interest and to facilitate the effective implementation of one or more PSAPs on the Navajo Nation, and their associated Service Plans. As the NNTRC is aware, NTUA Wireless is positioned to serve customers and areas of the Navajo Nation that other carriers have not yet served. NTUA Wireless received federal stimulus money under the American Reinvestment and Recovery Act of 2009 to enable this effort. The challenges of 911 service deployment in many areas across the Navajo Nation will be extreme, and NTUA Wireless desires to work closely with the NNTRC and other carriers in the analysis and recommendations with respect to bringing E911 or NG911 service to the Navajo Nation.

The numerous questions framed by the NNTRC for comment and input, as well as the diverse nature of the questions and the complexity of implementing E911 in the Navajo Nation's very rural expanse, demonstrate that deployment and funding of 911 services in the Navajo Nation will be complex and expensive. The good news is that the carriers and various experts in the field have considerable experience in deploying E911 in rural areas and thus can act as valuable resources to a working group searching for a fair, efficient and properly functioning solution for the Navajo Nation. As the Notice acknowledges, the Navajo Nation does not currently have basic 911 emergency service and thus the NNTRC is starting from "square one" in this effort.

A key element in 911 deployment, and one that is currently deficient, is proper addressing and mapping of the area to be served by the 911 system. It is elementary that a 911 system is only as good as the Master Street Addressing Guide ("MSAG") mapping. In order for

the first responders to locate callers, sufficient detailed information must be provided to the PSAP to pin-point the location of the emergency call. This is more difficult and often less precise in remote or rural settings; however, the technology and processes have advanced considerably with proper mapping and with sufficiently robust networks. Again, experts in 911 services deployment, along with input from carriers can leverage the experience of other entities in rural settings to avoid unnecessary efforts or “reinventing the wheel” in this proceeding.

As the Notice recognizes, cost recovery is also a key component for the NNTRC’s inquiry and determination. Receipt of state funding may be critical to the success of any effort to implement 911 services on the Navajo Nation where significant numbers of telephone service subscribers are already dependent on federal or state support programs, such as Lifeline programs to make services affordable. In this context, additional surcharges or taxes on subscribers may present further challenges. Once again, these are unique considerations that a working group and the NNTRC would presumably consider before making a recommendation.

SUMMARY

NTUA Wireless recommends that following the initial round of comments and input in this proceeding, the NNTRC establish a working group comprised of carriers (both wireline and wireless), NNTRC representatives and an independent expert with respect to 911 deployment and administration. The working group, following careful study and consideration, should provide a set of recommendations to the NNTRC that could then be noticed to gather further comment from interested stakeholders prior to the NNTRC taking further action in this important matter. NTUA Wireless, which is positioned to serve customers and areas of the Navajo Nation that presently lack service, is interested in participating in such a working group to address the lack of adequate 911 services. In particular, NTUA Wireless, if included in such a working

group, will work closely with the NNTRC and other carriers to analyze and form recommendations to bring 911 service to the Navajo Nation.

Respectfully submitted,

/s/ Steven B. Duke

Steven B. Duke
NTUA Wireless, LLC
1001 Technology Drive
Little Rock, Arkansas 72223
Telephone: (501) 448-1528
Facsimile: (501) 448-1563
E-Mail: StevenDuke@awcc.com

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