

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of:)	
)	
Implementing Kari's Law)	ET Docket No. 18-261
and Section 506 of RAY BAUM'S Act)	
)	PS Docket No. 17-239
Inquiry Concerning 911 Access, Routing, and)	
Location in Enterprise Communications Systems)	

REPLY COMMENTS OF REDSKY TECHNOLOGIES, INC.

Jerry Eisner, ENP
Vice President – Public Safety
RedSky technologies, Inc.
333 North Michigan Avenue, Suite 1600
Chicago IL, 60601
Phone: 312-432-5937
Fax: 312-432-4321

Filed: January 8th, 2019

SUMMARY

RedSky Technologies, Inc (RedSky) supports the Commission's approach to the consideration of new rules needed to implement the mandates of Kari's Law and Section 506 of the Ray Baum Act. While historically the Commission has not imposed uniform rules regarding the ability to dial 9-1-1 and the ability to deliver the location of the 9-1-1 caller who is using a Multiple Line Telephone System, we believe that Congress has determined that the time to act in this regard is now. It is not acceptable to the public safety community or the general public to expect different levels of 9-1-1 service based on the technology used to place a 9-1-1 call, especially when that technology may be invisible to the end user.

The technologies needed to support the mandates exist today within the 9-1-1 ecosystem that includes carriers, hosted providers, equipment manufacturers, and third party 9-1-1 service providers including VoIP Provisioning Center (VPC) providers.

By adopting rules, the Commission will ensure that Congress's public safety and the public safety providers objectives are met.

Contents

SUMMARY.....	2
I. INTRODUCTION.....	4
II. REDSKY TECHNOLOGIES, INC.	5
III. DISCUSSION.....	6
A. Uniform, National Rules Governing 9-1-1.....	6
B. Direct Dialing.....	7
C. Dispatchable Location.....	7
D. Support for Nomadic Users.....	9
E. Notification to the Enterprise	9
F. Effective Date.....	10
IV. CONCLUSION.....	10

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of:)	
)	
Implementing Kari’s Law)	ET Docket No. 18-261
and Section 506 of RAY BAUM’S Act)	
)	PS Docket No. 17-239
Inquiry Concerning 911 Access, Routing, and)	
Location in Enterprise Communications Systems)	

REPLY COMMENTS OF REDSKY TECHNOLOGIES, INC.

RedSky Technologies, Inc. (RedSky) respectfully submits the following comments in reply to the initial comments filed in response to the Commission’s Notice of Proposed Rule Making in the above referenced proceedings.

I. INTRODUCTION

The record in the above proceedings confirms one thing and only one thing. Public safety entities desire direct dialing and a dispatchable location to be delivered with every 9-1-1 call, independent of the platform the call for service originated on. In reviewing the responses from all of the parties, the acceptance of the Draft Rules varies from one hundred percent support to absolute rejection going as far as questioning both the Commission’s authority in this matter and the Legislative intent in both Kari’s Law and Section 506 of the Ray Baum Act.

II. REDSKY TECHNOLOGIES, INC.

We believe that it is important to be both clear and transparent regarding our place in the 9-1-1 ecosystem. RedSky Technologies was established in 1995 as a provider of software and services to assist enterprise customers with capturing device location data and formatting for transmission into the appropriate Private Switch Automatic Location Information (PS-ALI) databases. As telephony technology evolved, our products and services have as well. We support analog, digital, and Voice over Internet Protocol (VoIP) systems that use physical telephones, software based telephones (softphones) that connect via twisted pair copper, Layer 2 IP, fiber to the desk top, and wireless (Wi-Fi) solutions. We are manufacturer certified with:

- Avaya
 - Premise based
 - Hosted
- Broadsoft (owned by Cisco)
 - Premise based
 - Hosted
- Cisco
 - Premise based
 - Cloud or hosted
- Genesys
 - Premise based
- Microsoft
 - Premise based
- Ribbon
 - Premise based
 - Hosted
- Unify
 - Premise based
 - Hosted

We provide our products and services for customers of AT&T, CenturyLink, Cincinnati Bell Telephone, Comcast, Consolidated Telephone, Frontier, Sprint, Verizon and many other Competitive Local Exchange Carriers.

In addition, our products have been certified for use within the Department of Defense Bases/Camps/Posts/Installations by meeting the Joint Interoperability Test Command interoperability and cybersecurity testing requirements.

III. DISCUSSION

In reviewing the record, RedSky looked at six concepts contemplated by the Commission in its Draft Rules: uniform, National rules; Direct Dialing; determination and delivery of dispatchable location; support for nomadic users; notification; and the effective date.

A. Uniform, National Rules Governing 9-1-1

This concept was not universally supported. The comments filed by the American Cable Association and the Texas 9-1-1 Entities express concern about overlapping State and Federal rules. As the Commission is well aware, there is no uniform set of rules for 9-1-1 for MLTS systems. They vary from none to strict. Our customers come to us for best practices when their systems cover multiple political jurisdictions or jurisdictions where there are no requirements. RedSky asserts that a uniform set of rules, even if the rules set minimum capabilities, must be established by the Commission.

B. Direct Dialing

This concept was not universally supported. The comments filed by the Voice on the Net Coalition (VON) and the Adhoc Telecommunications User Committee took different approaches. VON wants to exempt small businesses, which they consider under ten lines. The Adhoc Telecommunications User Committee believes that the requirement should only be enforced after the effective date if technically feasible. Comments from public safety entities and their representative associations fully support the requirement. Other filed comments are silent on the issue. RedSky believes that the technology exists today to allow this Draft Rule to be enacted as written.

C. Dispatchable Location

No other concept generated the wide variation of opinion in the filed comments as this did. Public safety entities and their representative associations demand that a dispatchable location be delivered with every 9-1-1 call, independent of platform or technology as soon as possible. Two of the industry associations including: ATIS and TIA assert that this is not technically feasible at this time. We disagree. RedSky provides dispatchable location for all types of MLTS systems and endpoints and have been doing so for many years.

One of the often heard arguments against the delivery of a dispatchable location is the concept of burdensome from a financial perspective. This was especially prevalent from the users responding. We agree with the concept that the financial burden is proportional with the complexity of the MLTS system. What was not stated was that the financial ability to pay and

support dispatchable location is also proportional with the complexity of the MLTS system. An insurance agency with one location that has five rooms and no user mobility requires a straight forward, relatively simple approach to dispatchable location compared to a national financial institution with locations in multiple states, including some large, multi-story facilities, all served by a single hosted MLTS system. We assert that financial burden as measured as a percentage of telecommunications expense is similar for both entities.

Surprisingly, Avaya stated that dispatchable location is not needed by the 9-1-1 call taker at the Public Safety Answering Point (PSAP). They provided the only comment against the need for dispatchable location. It is important to note that the National Fire Protection Association in its published NFPA 1221: Standard for the Installation, Maintenance, and use of Emergency Services Communications Systems, 2019 Edition¹, mirrors the National Emergency Number Association MLTS Model Legislation 2015² in terms of establishing dispatchable location for every 9-1-1 call originating from an MLTS system. It is important because when the concept of dispatchable location was addressed in the forming of the 2016 edition of NFPA 1221, Avaya, through its representative Mr. Mark Fletcher, stated that dispatchable location was not needed and that notification and display of location at an alarm board within each building in the enterprise was a better solution. The NFPA 1221 Technical Committee followed ANSI Standard process in considering Avaya's comment. The approach was dismissed.

¹ <https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=1221>

² https://cdn.ymaws.com/www.nena.org/resource/collection/C3D071C2-FACD-41CB-A09C-354888272EF8/MLTS_2015.pdf

RedSky believes the record in these proceedings as well as in the ECS NOI refute the idea that providing a dispatchable location causes a financial burden to the MLTS manufacturer, provider, or user.

D. Support for Nomadic Users

The concept of being able to locate a nomadic user connected to a MLTS is supported by public safety users and 9-1-1 providers. In the same vein, carriers, their industry associations, and manufacturers are against requiring this capability. It is clear that public safety entities want the location of everyone calling 9-1-1 independent of technology. We believe that the manufacturers are taking a myopic view of the 9-1-1 ecosystem. If they have to build the capability into their equipment, then they are against the requirement. A broader view that incorporates everyone in the ecosystem demonstrates that nomadic users can provide a dispatchable location, independent of platform. We want to emphasize that the technology exists. In devices that support GPS, the location is based on existing technologies that allow the end user to add floor, room, or area to a civic address as envisioned in the Ray Baum Act. For those devices that do not have access to GPS, there are existing Internet based technologies to determine the location of the device i.e. Google Maps. RedSky supports the concept of requiring all MLTS based 9-1-1 calls to provide a dispatchable location to the PSAP.

E. Notification to the Enterprise

The concept of presenting a notification of a 9-1-1 call to someone in the enterprise of the MLTS user was the most widely accepted concept of all of the Draft Rules. The majority of

the comments on this concept were directed at not creating a requirement for specific content and leaving the content up to the user. RedSky supports the concept of user configurable notification content.

F. Effective Date

With regard to the Draft Rules concept of the Effective Date for implementation of both Kari's Law and Section 506 of the Ray Baum Act, the record follows the discussion above. Public Safety entities and providers want implementation sooner rather than later and industry wants exceptions i.e. small business, exclusions i.e. nomadic user dispatchable location, and grandfathering of existing systems with no suggested implementation date. Accepting the recommendation of industry does not move the issue, leaving the safety of the MLTS end user at the same unacceptable level of risk as they are forced to endure today. RedSky does not support any Rule that does not include a definitive implementation date.

IV. CONCLUSION

RedSky believes that all of the goals in both Kari's Law and Section 506 of the Ray Baum Act can be accomplished in the immediate near future using all of the available technologies in the 9-1-1 ecosystem, including those from carriers, manufacturers, cloud based solution providers who use commercially available platforms or "home grown" solutions, and third party providers like RedSky, West, and others that are coming into the market space. Congress acknowledged what public safety providers have been saying for decades, the first responder

needs to know where the caller is coming from, independent of platform technology. The time to act is now, with clarity of requirements, responsibilities, and timelines.

RedSky appreciates the opportunity to provide these reply comments and respectfully requests that the Commission proceed with a rulemaking and propose rules mandating direct dialing capability of 9-1-1, notification of a 9-1-1 call from a MLTS end point to an entity within the end user enterprise, the determination and delivery of a dispatchable location to the PSAP, all without regard for platform technology in an expeditious manner.

Dated: January 8th, 2019

Respectfully submitted,

/s/ Jerry Eisner, ENP

Jerry Eisner, ENP

Vice President – Public Safety

RedSky technologies, Inc.

333 North Michigan Avenue, Suite 1600

Chicago IL, 60601

Phone: 312-432-5937

Fax: 312-432-4321