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January 10, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: In the Matter of Implementing Kari's Law and Section 506 of RAY
BAUM'S Act PS Docket No. 18-261

Inquiry Concerning 911 Access, Routing, and Location in Enterprise
Communications Systems PS Docket No. 17-239

Dear Ms. Dortch:

The Industry Council for Emergency Response Technologies (“iCERT” or “Industry Council”)¹ respectfully submits the following reply in response to the public notice released by the Federal Communications Commission (“FCC” or “Commission”) on September 26, 2018² in connection with the above-referenced dockets. iCERT appreciates this opportunity to provide feedback to the Commission, and notes that several of its members have provided comments in this proceeding.³

True to iCERT’s nature, given the current vigorous technology and business environment in public safety, iCERT’s members have provided a detailed spectrum of guidance to the Commission on issues such as dispatchable location⁴, and the Commission’s proposal to apply the interconnected VoIP 911 rules, including the registered location choice, to newly defined outbound-only “911 VoIP services”.⁵ However, even with diverse views, all of iCERT’s

¹ Established by a group of prominent business leaders in December 2005 originally as the 9-1-1 Industry Alliance, iCERT plays an important role as the voice of commercial public safety technology providers, wireless carriers, manufactures, software vendors, system integrators, IoT technologists, and related vendors on public policy issues impacting 9-1-1, the nation’s emergency response system(s), and all vendors providing emergency response and related technologies. iCERT’s membership becomes more diverse every year, and many of its members not only have differing business objectives, they may be direct competitors. As such, individual members often provide separate comments to the Commission that agree with, amplify, differ from, or are in addition to the comments offered by iCERT. This happens because all iCERT’s members agree that an invigorated vendor community engaged in frequent two-way dialog with public safety officials, regulators, each other, and policy makers is indispensable to creating the highest quality emergency services for all Americans. Industry Council members believe history has established and continues to demonstrate that business leaders’ expertise can greatly assist public policy makers and government emergency communications professionals as they address complex choices regarding advanced public safety communications technologies and solutions. *More information at:*

<http://www.theindustrycouncil.org/>

² Notice of Proposed Rulemaking, DA 18-132, adopted and released on September 26, 2018 (“NPRM”).

³ Comtech Telecommunications Corp.; Verizon; AT&T; and West Safety Services, Inc.

⁴ See NPRM ¶ 58.

⁵ See NPRM ¶ 82.



members affirm their dedication to compliance and to enabling high quality reliable public safety services to their customers and the American public.

The Commission also proposes consolidating certain of its 9-1-1 rules, making related non-substantive changes, and invites “. . . commenters to identify any additional rules that they recommend for consolidation in Part 9, as well as any rules that should be updated in light of our proposal.”⁶ BRETSA suggested an inquiry into 9-1-1 fees related to digital broadband facilities connected to an MLTS.⁷

While iCERT has no objection to a non-substantive rule reorganization, any potential substantive updating of any Commission rules, such as BRETSA’s suggestion, would most productively be undertaken in a separate Commission undertaking consistent with the Commission’s past practices. iCERT would participate in any new docket related to 9-1-1 fees and hopes that the Commission will seek out every opportunity to increase 9-1-1 funding under its own authority, and to support where possible similar Congressional and state initiatives.

iCERT commends the Commission for its efforts to advance emergency communications including these Dockets. We offer our time and expertise in the event the Commission has any questions, in particular should the Commission wish to address new revenue sources for 9-1-1 / NextGen 9-1-1 services.

Respectfully submitted,

/s/ Kim Robert Scovill

Kim Robert Scovill.
Executive Director

⁶ See NPRM ¶ 106.

⁷ Comments Of The Boulder Regional Emergency Telephone Service Authority (“BRETSA”) at p.6.
<https://ecfsapi.fcc.gov/file/12111529620532/BRETSA%20181210%20Comments%20PS%2018-261%20KARIs%20LAW%20NPRM.pdf>