

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of
Revision of the Commission's Rules to Ensure
Compatibility with Enhanced 911 Emergency
Calling Systems.

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PS Docket No. 07-114

JOINT PETITION FOR EXTENSION OF COMMENT AND REPLY COMMENT

DEADLINES

The Industry Council for Emergency Response Technologies (iCERT),¹ the National Association of State 9-1-1 Administrators (“NASNA”),² NENA: The 9-1-1 Association (“NENA”),³ the Texas 9-1-1 Alliance,⁴ and the Texas Commission on State Emergency Communications⁵ (collectively, “Petitioners”) hereby respectfully submit this request for an

¹ iCERT — the Industry Council for Emergency Response Technologies — is the exclusive trade association championing commercial public safety response technology providers and related organizations. iCERT improves the public safety ecosystem through ensuring that the needs and views of commercial technology providers are recognized and accommodated by all levels of government, driving continuous technology improvements, education, and helping our members reach their organic and marketplace growth objectives.

² NASNA represents state 911 programs in the field of emergency communications. NASNA provides state 911 leaders’ unique expertise to national trade associations, public policymakers, the private sector, and emergency communications professionals at all levels of government as they address complex issues surrounding the evolution of emergency communications.

³ NENA: The 9-1-1 Association improves 9-1-1 through research, standards development, training, education, outreach, and advocacy. Our vision is a public made safer and more secure through universally-available state-of-the-art 9-1-1 systems and trained 9-1-1 professionals. NENA is the only professional organization solely focused on 9-1-1 policy, technology, operations, and education issues.

⁴ The Texas 9-1-1 Alliance is an interlocal cooperation entity composed of 26 Texas emergency communication districts with E9-1-1 service and related public safety responsibility for more than 63% of the population of Texas. These emergency communication districts were created pursuant to Texas Health and Safety Code Chapter 772 and are defined under Texas Health and Safety Code Section 771.001(3)(B).

⁵ The Texas Commission on State Emergency Communications (“CSEC”) is a state agency created pursuant to Texas Health and Safety Code Chapter 771, and by statute is the state's authority on emergency communications. CSEC's membership includes representatives of the Texas 9-1-1 Entities and the general public, and CSEC directly oversees and administers the Texas state 9-1-1 program under which 9-1-1 service is provided in 206 of Texas' 254 counties, covering approximately two-thirds of the state's geography and one-fourth of the state's population.

extension of the comment and reply comment deadlines in the above-captioned proceedings, currently set for February 18, 2020 and March 16, 2020, respectively.⁶ The Petitioners hereby request that comments be due no later than February 21, 2020, and that reply comments be due no later than March 20, 2020. A short extension of the aforementioned deadlines will serve the public interest by allowing time for crucial policy, technical, operational, and business conversations to take place during key stakeholder meetings scheduled during the comment and reply comment periods.

The Commission's *Fifth Further Notice of Proposed Rulemaking*, released November 25, 2019, raises a number of important legal, technical, operational, and business questions pertaining to the feasibility of advanced vertical location, mapping, and addressing services for 9-1-1. Answers to some of these questions lie outside the traditional 9-1-1 ecosystem, requiring participation from companies and public safety entities with expertise in three-dimensional indoor mapping. In addition, the Commission's proposals require in-depth consideration of existing standards and the extent to which they require modification.

The opportunity to develop the record is made even more challenging by three major events in the 9-1-1 policymaking space. First, NENA's *NG9-1-1 Standards & Best Practices Conference* ("SBP") occurred January 20–23, 2020. SBP brings together technical and operational experts from the 9-1-1 industry to create and refine best practices, guidelines, resources, and documents that enable Next Generation 9-1-1 services, systems, and operators to function effectively and foster interoperability. The collective 9-1-1 technical and operational

⁶ See *Public Safety and Homeland Security Bureau Announces the Effective Date and Comment Cycle for the Vertical Location Accuracy (Z-Axis) Fifth Report and Order and Fifth Further Notice of Proposed Rulemaking, Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, (January 16, 2020) ("PN"), referencing *Wireless E911 Location Accuracy Requirements, Fifth Report and Order and Fifth Further Notice of Proposed Rulemaking*, FCC 19-124 (rel. Nov. 25, 2019) amended by Erratum (rel. Jan 15, 2020) ("FNPRM").

expertise at this event is unparalleled, and the discussions that take place will surely affect 9-1-1 stakeholders' contributions to the record.

Secondly, NENA's *9-1-1 Goes to Washington* ("GTW"), which brings hundreds of 9-1-1 professionals together with government leaders to address today's most pressing 9-1-1 and emergency communications policy issues, occurs February 12–15, 2020. Many of these 9-1-1 professionals plan to schedule *Ex Parte* meetings during GTW to discuss important topics in indoor location accuracy — discussions which will undoubtedly contribute to the record and better inform the Commission and interested stakeholders. Both SBP and GTW provide a setting where various expert stakeholders can communicate with each other to find points of mutual agreement on issues like those contained in the current FNPRM.

Lastly, the Alliance for Telecommunications Industry Solutions ("ATIS") Emergency Services Interconnection Forum ("ESIF")⁷ has its in-person meeting February 25th–26th, 2020. ESIF — the ATIS group tasked with developing Next Generation 9-1-1 and location accuracy requirements and solutions, as well as resolving technical and operational issues to facilitate interconnection of emergency services networks with other networks — provides an important forum for information exchanges on 9-1-1 location standards. These exchanges will help clarify more clearly which changes in 9-1-1 standards, such as the industry E2 interface and z-uncertainty, are necessary to accommodate the Commission's new requirements and proposals.

The Petitioners recognize that requests to extend filing deadlines are not routinely granted. However, the Commission has previously found that an extension is warranted when it is necessary to ensure the Commission receives full and informed responses and that the affected

⁷ See https://www.atis.org/01_committ_forums/esif/

parties have a meaningful opportunity to develop a complete record for the Commission’s consideration.⁸ The Petitioners here seek an extension of time to allow interested parties to analyze the complex and expansive issues raised in the *FNPRM* regarding the evolving indoor location accuracy ecosystem and the feasibility of large-scale indoor 3D mapping and addressing. The Petitioners welcome this discussion and believe it is of paramount importance for the Commission to develop a full and complete record in this proceeding. Under these circumstances, Petitioners believe that a brief extension of time is warranted.

⁸ E.g., Public Safety and Homeland Security Bureau, *Order Granting Request for Extension of the Reply Comment Deadline*, DA No. 15-299 (March 6, 2015) (*In the Matters of 911 Governance and Accountability and Improving 911 Reliability*, Docket Nos 14-193 & 13-75)).

Respectfully submitted,

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