

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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

**REPLY COMMENTS OF  
COMTECH TELECOMMUNICATIONS CORP.**

Comtech Telecommunications Corp. (“Comtech”)<sup>1</sup> respectfully submits these comments to the Federal Communications Commission (“FCC” or “Commission”) in reply to the initial comments filed in response to the Commission’s Notice of Proposed Rulemaking in the above-referenced proceeding.<sup>2</sup>

The record in this proceeding demonstrates the importance of ensuring that sufficient caller location standards apply to all 911-capable communications services. As a leading provider of Enhanced 911 (“E911”) and Next Generation 911 (“NG911”) advanced communications solutions for both commercial and government customers, Comtech understands the importance of ensuring that consumers can quickly and consistently reach an appropriate PSAP and that any dispatched first responders have sufficient information to quickly locate 911 callers. Comtech is encouraged

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<sup>1</sup> When referencing Comtech, we include its direct and indirect wholly-owned subsidiaries, TeleCommunication Systems, Inc. (“TCS”) and NextGen Communications, Inc. (“NextGen”), respectively.

<sup>2</sup> *Implementing Kari’s Law and Section 506 of RAY BAUM’S Act, Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, PS Docket Nos. 18-261 and 17-239, Notice of Proposed Rulemaking, FCC 18-132 (Sept. 26, 2018) (“*NPRM*”).

by the record in this proceeding, as many commenters urge the Commission to ensure that any adopted regulations are technologically-neutral and allow for flexibility.<sup>3</sup> Comtech also agrees with commenters' assertions that the Commission should carefully tailor rules to encourage and facilitate innovation in the location services marketplace.<sup>4</sup>

Although Comtech largely agrees with many commenters in this proceeding, Comtech is concerned by comments that seemingly fail to grasp that a dispatchable location may not always be the best source of location information.<sup>5</sup> While Comtech appreciates the position that PSAPs need to receive dispatchable location information that guides “first responders to the right door to kick down,”<sup>6</sup> in some environments a dispatchable location is simply not the best way to locate a 911-caller. For example, dispatchable location information is not very useful on an MLTS system when a 911-caller makes a call from within an open area of a huge building<sup>7</sup> or from a building located far away from the property entrance indicated by the dispatchable location information. Exclusively relying on dispatchable location information may also be problematic if the size and layout of a given structure presents a challenge to emergency responders seeking to locate a 911-caller. In situations where a dispatchable location cannot provide sufficiently granular information, it may be necessary to utilize sources of location information (such as x/y/z coordinates) that are not tied to a named place, address, building, or structure. In addition, even

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<sup>3</sup> See, e.g., Comments of AT&T at 6 (explaining that “[e]venhanded treatment of all technologies will encourage the development of additional solutions for consumers while making sure their 911 needs are met.”). See also Comments of the Alliance for Telecommunications Industry Solutions at 3; Comments of Microsoft Corporation at 9 (“Microsoft Comments”).

<sup>4</sup> See, e.g., Microsoft Comments at 9.

<sup>5</sup> See Comments of APCO International at 3.

<sup>6</sup> *Id.*

<sup>7</sup> E.g., a large open warehouse or parking garage.

more granular dispatchable location information (with details such as room or suite numbers) may become less relevant as MLTS systems allow end-users to place VoIP calls using mobile-capable devices, such as laptops, smartphones and tablets, since existing MLTS systems generally do not automatically update a caller's dispatchable location when a device has moved (or while a device is in motion during a call).

Even in environments where dispatchable location information appears to be sufficient for directing emergency responders, concurrently using other sources of location information, such as x/y/z coordinates, is critical for validation purposes. As the Metropolitan Emergency Services Board ("MESB") emphasized, PSAPs are increasingly seeing 911 calls that are routed to the wrong PSAP due to VoIP-based MLTS system end-users' errors in entering or updating their registered location addresses.<sup>8</sup> Verifying dispatchable location information using other sources of location information can help prevent such potentially life-threatening routing problems and increase PSAPs' level of trust in dispatchable location information. For example, as newer MLTS hardware incorporates Wi-Fi and Bluetooth beacon information, or even Global Navigation Satellite System ("GNSS") signals, such geodetic location information could automatically corroborate human-provisioned dispatchable location information, yielding improved accuracy and reassuring PSAPs that first responders are being dispatched appropriately. Likewise, with respect to VoIP calls on nomadic devices, dispatchable location

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<sup>8</sup> See MESB Comments at 5-6 (as an example explained that "a 9-1-1 call from a local Minnesota fast-food chain restaurant routed to [the] Travis County Sheriff's Office in Austin, Texas" due to the local restaurant owner's location being either not entered at all or incorrectly entered into a VoIP MLTS system's database).

information can be verified with handset-initiated device-based hybrid (“DBH”) location information.<sup>9</sup>

### **CONCLUSION**

Comtech appreciates the opportunity to provide these reply comments and urges the Commission to carefully craft any new requirements to allow for flexibility in determining the best source of available location information and whether more than one source of location information is necessary.

Respectfully submitted,

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<sup>9</sup> While Comtech encourages the use of newer location technologies, including those that rely on crowd-sourced data, DBH location information, and network-based Wi-Fi and Bluetooth beacon techniques, the Commission should first carefully address questions about the reliability and sustainable availability of these newer technologies. For example, the Commission should clarify whether providers of a newer location technology can and should be held responsible for the veracity and accessibility of the information made available to carriers and PSAPs.