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Via ECFS

Ms. Marlene Dortch
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Notice of *Ex Parte,* PS Docket No. 07-114, PS Docket No. 18-261 and PS Docket 18-64

Dear Ms. Dortch,

Precision Broadband submits this letter in response to a number of inquiries received regarding the estimated investment associated with implementing the Fixed Broadband 911 system proposed in our comments to the above captioned proceedings.[1] For completeness, we have considered the projected benefits, costs, consumer expectations, and potential funding mechanisms associated with this system.

In each of these proceedings, the expected benefits stated by the Commission for adopting the proposed rules could yield an annual savings of between $4.6 billion to $92 billion, measured as a product of potential lives saved and the "Value of a Statistical Life". In the Fourth Further Notice of Proposed Rulemaking (PS 07-114), the "Commission characterized this $92 billion as an annual benefit floor value because it also expected substantial, unquantifiable benefits from the reduction of human suffering and loss of property."

The implementation of the Commission rules that apply to just multi-line landline telephone service and mobile phones will most definitely save lives and property by expediting emergency response to the citizens that use those devices. Not only does the Fixed Broadband 911 system offer improvements to mobile phone 911 with timely and accurate locations, it can also save even more lives by broadening 911 access to many non-phone, broadband-connected devices (e.g., tablets, smart speakers, accessibility devices, PCs and IoT).

Consumers have a desire (and growing expectation) to use non-phone, broadband-connected devices to contact 911. In July 2018, Precision Broadband commissioned a study to gauge consumer perceptions of 911 and alternative access technologies. Of the 250 people surveyed, 63% said they would like to be able to contact 911 using one or more devices through their home broadband connection. This was further validated in the December 2018 "Smart Audio Report" where 55% of consumers "expressed interest in having a feature that would allow their smart speaker to call 911 if multiple smoke alarms went off in the home."[2] The "Smart Audio Report" also stated that 21% of households have at least one smart speaker today, and many more expect to purchase one.

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[1] *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Fourth Further Notice of Proposed Rulemaking, FCC 19-20m para. 30, (March 15, 2019); *The Matter of Location-Based Routing for Wireless 911 Calls*. Notice of Inquiry, PS Docket 18-64, para. 39. (Mar 23, 2018); and, *In the Matter of Implementing Kari's Law and Section 506 of RAY BAUM's Act*, PS Docket No 18-261 and *Inquiry concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, PS Docket No. 17-239. Notice of Propose Rulemaking, para.89. (Sep 26, 2018).

[2] *The Smart Audio Report*, December, 2018 by Edison Research and NPR.

Based on a number of assumptions that are still being investigated, Precision Broadband has modeled a range of potential expenditures for implementing and supporting the Fixed Broadband 911 system across the entire ecosystem. Such amounts predominantly relate to building, testing, deploying, managing, securing and maintaining the network elements and software associated with the Internet Service Providers, location information server/VoIP Positioning Center hosting entities, device OEMs and operating systems, mobile carriers, and PSAP interconnection providers. Based on our models, we project an expenditure of between $200 million and $275 million per year for the Fixed Broadband 911 system at full nationwide deployment. This amounts to $0.61 - $0.84 per capita per year (4.2% - 5.7% of the estimated $14.74 per capita expenditure reported to provide 911 services).[3]

Please note that these are ballpark estimates that may materially change once all participating parties have provided input regarding roles, responsibilities and costs.

Lastly, in our comments to PS Docket 18-64, we suggested that the "cost of implementing such [broadband-enabled 911] technology by the participants in the ecosystem [could] be funded through 911 fees collected from broadband data customers".[4] Until now, there has been no basis for assessing such fees on broadband because the data service has not been used for 911. The Fixed Broadband 911 system provides such a basis. At an average 911 fee of $0.83 per broadband connection per month,[5] an additional $1 billion per year could be collected to support the technology as well as provide funding for NG911 deployments among all states and 5,200 PSAPs. In the aforementioned July 2018 Precision Broadband 911 study, 59% of those interested in using their broadband connection for 911 said they would willing pay an additional $0.50-$1.00 per month with their broadband bill to have this capability.

We hope to have provided a meaningful response to the inquiries regarding costs and benefits of the Fixed Broadband 911 system. If you have questions or need additional information, please contact me anytime.

Respectfully submitted,

Charles H. Simon, Jr.

cc: Eric Burger (via email)

[3] Tenth Annual Report to Congress on State Collection And Distribution of 911 And Enhanced 911 Fees And Charges for the Period January 1, 2017 to December 31, 2017, Table 4, Page 17 (December 17,2018), *available at* https://www.fcc.gov/files/10thannual911feereporttocongresspdf

[4] Comments of Precision Broadband LLC, PS Docket No. 18-64 (Filed May 1, 2018), *available at* https://ecfsapi.fcc.gov/file/1050190070698/Precision%20Broadband%20Comments-PS%2018-64%202018-5-1%20.pdf

[5] Approximate weighted average 911 fee billed per month nationally per wireline and wireless phone line. $4.5 billion in 911 fees billed annually ÷ 450 million lines ÷ 12 = $0.83.