

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

In the Matter of)	
)	
Location-Based Routing)	PS Docket No. 18-64
For Wireless 911 Calls)	

**Comments of the
National Association of State 911 Administrators**

The National Association of State 911 Administrators (NASNA)¹ is pleased to offer reply comments on the 23 March 2018 Notice of Inquiry concerning Location Based Routing (LBR). ²

NASNA believes that it is important to be clear about the problem we are trying to fix. Many, perhaps most, 911 calls that are labeled “misroutes” are not actually misroutes. 911 calls are routed based on how cell sectors are programmed. Cell sector coverage and PSAP boundary coverage may not match perfectly. Sector programming may be adjusted to route 911 calls more appropriately when a sector’s coverage incorporates more than one PSAP boundary. We agree with CTIA that existing routing technology can be improved with better communication between PSAPs or 911 authorities and the provider when routing problems are identified, or when a carrier makes changes to its network that may impact 911 call routing. Verizon points out that there are many reasons why cell sector-based routing will be required for the foreseeable future – with or without LBR. Collaboration between PSAPs and providers to optimize performance will continue to be necessary.

RapidSOS, in its initial comments, highlighted its success in delivering device-based hybrid location to PSAPs as supplemental data and observed that it still remains ‘to translate those findings into actionable steps towards

¹ NASNA represents state 911 programs in the field of emergency communications. NASNA believes that state 911 leaders’ unique expertise can assist 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.

² Individual members may provide separate comments to the Commission that agree with, amplify, differ from, or are in addition to the comments offered by NASNA on this matter.

using device-based hybrid location services for 911 call routing.’ Considerable work would need to be done and that work will have a cost, although how much, exactly, is not clear from the record created in this proceeding.

Several commenters expressed hope that LBR would stimulate NG911 implementation. Perhaps it would, however, nothing in the record on this NOI would lend substance to that concept. NG911 has to be the priority. Where NG911 has been implemented, it would be highly desirable for providers to begin developing their own systems’ capabilities for location-based routing where NG911 has been implemented in their service areas.

The *CSRIC V LBR Report* mentions (but does not recommend) implementing location-based routing by holding a wireless 911 call at a wireless MSC or the PSAP gateway until Phase II location is available, even if that means not completing the call to the PSAP within six seconds or the caller hangs up. For all the reasons stated by various commenters, NASNA does not agree with holding the call. Six seconds is an eternity in an emergency, and the likelihood of a caller hanging up in frustration and calling again is high. That would cause even more problems for PSAPs and for the 911 system.

The NOI seeks comment on whether the NEAD could be leveraged for wireless call routing, and if not, what would need to be done to provide it with that capability and with sufficient security. Commenters that addressed this point generally thought it would be premature to make that determination, and NASNA agrees. The NEAD is mid-stream in its development. A major change in purpose would have a negative impact on its deployment timeline and its price tag.

We appreciate the Commission’s attention to this important issue and thank you for the opportunity to offer comments for your consideration.

28 June 2018

Respectfully submitted,

A handwritten signature in cursive script that reads "Evelyn Bailey".

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