

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

In the Matter of)	
)	
Reliability and Continuity of Communications)	PS Docket No. 11-60
Networks, Including Broadband Technologies)	

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

The National Association of State 911 Administrators (NASNA)¹ is pleased to offer comments on the 13 June 2018 Notice of Inquiry on the effectiveness of the wireless network resiliency cooperative framework and the study on public access to 911 services during emergencies.²

The Commission’s NOI begins by referencing the devastation caused to communications systems by the 2017 hurricanes and seeks quantifiable information about how well the Cooperative Framework worked during and after the disasters and what could be done to improve it.

Measuring the Extent of the Framework’s Use and its Effectiveness

The Commission asked how best to measure the extent of the framework’s use and its effectiveness. NASNA suggests simply requiring the signatories to report based on metrics to which the Commission and the providers have agreed. It is difficult to extract measurable data elements from a narrative, so some other format, such as a survey form, would be preferable. Free form narrative may be useful in explaining or interpreting specific data elements.

¹ 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.

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.

Incorporating Backhaul Providers in the Framework

It was clear from the comments and reply comments of the major wireless providers in PS Docket No. 17-344 that a majority of sites reported to DIRS were out of service due to the loss of backhaul. The Commission's question about whether effort should be made to bring backhaul providers into the Framework was a good one. It makes sense to NASNA that every entity that has a piece of the larger communications system should be included – after all, the wireless carriers' networks are just one part of a system comprising many parts. If wireless carriers are reliant upon other types of providers to deliver service, then those providers should be invited into the Framework. We believe the Commission has an obligation to look at communications systems comprehensively and is in a position to promote or require this.

Securing Access to Networks in Disasters

During last year's hurricanes, people used Wi-Fi access points to get emergency assistance and to contact loved ones when mobile service was unavailable. It is clear that there were public safety benefits to this, and that it is technically feasible to deploy hotspots for that purpose. Public and private Wi-Fi should be made available for emergency use without a login requirement during such extreme situations. We would hope that any entity with operational communications resources would be willing to participate.

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

16 July 2018

Respectfully submitted,

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

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