

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

In the Matter of	§	
	§	
	§	PS Docket No. 13-75
Public Safety and Homeland Security Bureau	§	
Seeks Comment on 911 Network Reliability	§	
Rules	§	
	§	

COMMENTS OF NENA: THE 9-1-1 ASSOCIATION

NENA: The 9-1-1 Association¹ hereby submits these comments in response to the Commission’s Public Notice (“Notice”)² in the above-captioned proceeding. In these comments, NENA emphasizes that significant further discussion should take place with regard to 9-1-1 access over Wi-Fi, specifically in the areas of network access policies, call routing, and caller location.

1. The Commission’s 911 Network Reliability Rules should address the databases and software that underpin the physical network

The Commission requests comment on whether its “current 911 reliability requirements adequately encompass transitional and NG911 networks.”³ NENA believes the Commission’s Reliability Rules are necessary to prevent avoidable service degradation and outages, but submits that the Rules do not encompass the databases and software which underpin the infrastructure of the NG9-1-1 network. NENA believes the Commission should examine whether expanding the

¹ 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 safety 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.

² See PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT ON 911 NETWORK RELIABILITY RULES, PS Docket No. 13-75, Public Notice (rel. June 13, 2018) (hereinafter “Notice”).

³ Notice at 2.

scope of its Rules to include these parts of the NG9-1-1 environment is necessary to ensure reliability and resilience as the nation transitions to NG9-1-1.

Further, the Commission’s Communications, Security, Reliability, and Interoperability Council VI, Working Group 1, Task 1 has, as of June 29, 2018, delivered its *Final Report on Recommendations for 9-1-1 System Reliability and Resiliency During the NG9-1-1 Transition*.⁴ This report should further inform the Commission’s discussion when choosing whether and how to require covered 911 providers to implement certain best practices. The group is currently assessing which parts of the NG9-1-1 system require the whole-cloth creation of new best practices, and which legacy best practices can be adapted to apply to the NG9-1-1 environment.

2. The rapidly growing and diversifying 9-1-1 industry merits an expansion of the scope of the term “covered 911 service provider”

In only a few short years the 9-1-1 industry has grown by leaps and bounds and in almost every conceivable direction, with vendors offering supplemental data services, 9-1-1 apps, advanced computer-aided dispatch (CAD) and responder situational awareness integrations. Despite the flexibility and planning of the 9-1-1 community, these products and services are rapidly becoming integral to the workflow of the modern PSAP. As these advancements continue to expand into the Next Generation 9-1-1 center — and because many do not fall under the traditional interpretation of “covered 9-1-1 service provider,”⁵ the Commission should query whether they are integral enough to merit resiliency and reliability requirements.

⁴ See CSRIC VI, Final Report – RECOMMENDATIONS FOR 9-1-1 SYSTEM RELIABILITY AND RESILIENCY DURING THE NG9-1-1 TRANSITION, published June 29, 2018 (<https://www.fcc.gov/files/csric6wg29junereportdocx>).

⁵ 47 CFR 12.4(a)(4). The statutory language refers generally to entities that provide “the functional equivalent of [911, E911, or NG911 capabilities such as call routing, automatic location information (ALI), {and} automatic number identification (ANI)],” but this term may allow for certain providers to avoid falling under the purview of the Commission’s rules.

3. NENA supports the outage reporting improvements provided by the ATIS Network Reliability Steering Committee (NRSC)⁶

As stated in the *Notice*,⁷ the NRSC is working to provide recommendations for a standardized outage reporting template that will aid PSAPs and 9-1-1 authorities in quickly understanding the nature of a service degradation or network downtime. NENA participates in these efforts and supports the NRSC's continued work.

4. Conclusion

NENA thanks the Commission for the opportunity to comment on this important matter and looks forward to engaging with stakeholders in the 9-1-1 community to work toward expanding the scope and accessibility of 9-1-1, and the pursuit of nationwide NG9-1-1.

Respectfully submitted,



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⁶ The Network Reliability Steering Committee “provides timely consensus-based technical and operational expert guidance and best practices to all segments of the public communications industry.” The outage reporting template “was developed by a joint initiative that was led by the NRSC and included participation by the Association of Public-Safety Communications Officials (APCO), the National Association of State 911 Administrators (NASNA) and [NENA].” See generally http://www.atis.org/01_committ_forums/nrsc/.

⁷ Notice at 4.