

July 25, 2019

Ex Parte

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

Re: *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

Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules, GN Docket No. 11-117

Dear Ms. Dortch:

On July 24, 2019, Rachel Petty of RingCentral, Inc. and Austin Bonner and I, both of Harris, Wiltshire & Grannis LLP, met by phone with staff of the Public Safety and Homeland Security Bureau regarding the draft Report and Order in the above captioned dockets that has been placed on the agenda for the Commission's August 1 open meeting. The Bureau participants were David Furth, Erika Olsen, John Evanoff, Dr. Rasoul Safavian, Thomas Eng, and William Beckwith.

On the call, RingCentral emphasized that it shares the Commission's goal of providing users with the best available emergency location information. RingCentral identified potential ambiguities in the language of the draft rules that could interfere with the Commission's goal of quickly providing the most precise location information available to Public Safety Answering Points.

First, RingCentral discussed its concern that any location updating process pursuant to draft Rule 9.11(b)(4)(ii)(B)(3) be fast, simple, and accessible for people with disabilities. This is particularly critical with respect to any circumstance where the caller is expected to make an update at the time of the emergency call. In some cases, the best solution may be to have a trained operator at a National Emergency Call Center gather the new location information.

As Bureau staff noted, the draft Report and Order envisions a role for emergency call centers in the context of Telecommunications Relay Services. Because the Report and Order refers repeatedly to the process of a customer providing a new registered location as a "manual update," it may be unclear that verbally providing the information to a call center satisfies the rule. RingCentral appreciates Bureau staff's suggestion of the emergency call center as a backstop if no other means of identifying location are available and suggests that the Report and

Order be clarified to confirm that the same backstop is available for users of interconnected VoIP services when updating location pursuant to draft Rule 9.11(b)(4)(ii)(B)(3)(i).

RingCentral also noted that the rules could be read to subject some services to conflicting requirements. As the Commission acknowledges in its definition, multi-line telephone systems are often VoIP based. The Commission should consider clarifying that 911 calls from a particular device or end-user terminal can only be subject to one set of location requirements.

Pursuant to the FCC's rules, we have filed a copy of this notice electronically in the above-referenced dockets. If you require any additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'BDS' followed by a stylized flourish.

Brita D. Strandberg
Counsel to RingCentral, Inc.

cc: David Furth
Erika Olsen
John Evanoff
Dr. Rasoul Safavian
Thomas Eng
William Beckwith