

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

In the Matters of)	
)	
Improving 911 Reliability)	PS Docket No. 13-75
)	

**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 13 June 2018 Notice of Inquiry on the Commission's 911 network reliability rules.²

Alternatives to Current 911 Reliability Rules

The Bureau asked whether the Commission should replace the existing 911 reliability rules with an alternative framework that would eliminate current requirements for 911 circuit diversity, availability of central office backup power, and diverse network monitoring. We agree with the majority of commenters: These specific requirements were adopted for a reason, and that reason is still valid. NASNA views these requirements as necessary and would not support any effort to eliminate or relax them.

Utility of the Certification Process

The annual certification process is useful to state 911 administrators. It enables them to know what each individual provider has warranted on record. When issues arise, it enables them to work with the covered 911 service provider and the Commission to resolve those issues. Annual certification is important, because a lot can change in a network in the course of 12 months as the Commission correctly noted. A longer period of time would make it too easy to overlook compliance with the Commission's rules until a catastrophic event revealed an oversight had been made. We disagree with USTelecom³, INdigital⁴, Alaska Communications⁵ and other commenters that argued otherwise. Annual certification underscores the importance of 911 reliability and keeps everyone focused on it, regardless of whether or not anything has changed since the previous year's certification.

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.

³ USTelecom initial comments page 3

⁴ INdigital initial comments page 4

⁵ Alaska Communications initial comments page 5

Definition of a Covered 911 Service Provider

The NOI asked if the growing diversity of industry participants in the transitional and NG911 environment are adequately encompassed by the term “covered 911 service provider.” Some of these new industry participants are adequately encompassed by the term, but some are not as noted by various commenters. In particular, it remains unclear whether or not a provider of an over-the-top application or other indirect solution for location and other data is encompassed by the definition. We agree with the initial comments of the National Emergency Number Association (NENA) and the Association of Public-Safety Communications Officials (APCO) that the Commission should investigate this matter, consider it carefully and take appropriate action.⁶

Effectiveness of the Current PSAP Notification Requirements and Standardization

NASNA believes that the current PSAP notification requirements have not been especially effective. The Commission held a workshop on this topic on 11 September 2017. In the months since then, NASNA has worked with the Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC) to develop a 911 outage notification template and supporting informational materials. The purpose of this effort was to improve the process and make it more useful and informative to state and local 911 authorities and PSAPs. We recommend that the Commission give this new process time to roll out among the different types of providers, and time to see whether it achieves its intended purpose. The FCC can assist by promoting use of this standardized process by all covered 911 service providers, and not just those who were directly involved in the process.

Streamlining

The standardized notification process would streamline notifications to just three: initial, update and final.

The *Initial* notification is intended to make the PSAP aware that a 911 service affecting event has been recognized and that restoration efforts are in process. The Initial notification also includes information about the failure or outage event owners (if known), contact methods, possible impacts, geography potentially impacted by the event (single-PSAP, regional, multi-state, or other), an expected time to resolution if known, and information on apparent cause, if known.

The *Update* notification is intended to provide the PSAP with information that has been gathered or determined in the interim between the *Initial* and the *Final* notifications. Updates will be provided if a significant change occurs in the status of the outage. If no update is provided, the PSAP can assume that the information remains the same.

The *Final* notification is intended to provide the PSAP with an awareness that all systems and networks are operating as designed. Additional information regarding the event may be included.

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

⁶ NENA initial comments, page 2, and APCO initial comments pages 1 and 2

13 August 2018

Respectfully submitted,

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

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