

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of the Commission's
Rules to Define Effective Means
for Interworking of Customer
Premises Equipment and Public
Enhanced 9-1-1 Systems

RM-8143

COMMENTS OF THE SOUTH CAROLINA
BUDGET AND CONTROL BOARD,
DIVISION OF INFORMATION RESOURCE MANAGEMENT

The South Carolina Budget and Control Board, Division of Information Resource Management ("DIRM"), by its attorneys, hereby submits its comments in response to Adcomm Engineering Company's ("Adcomm") Petition for Rulemaking ("Petition").¹

DIRM is the South Carolina state agency responsible for the procurement and management of the communications and data processing resources of state government. One of the missions of DIRM is to develop procedures and facilities to ensure reliable communications in times of emergency. DIRM is interested in various proposals to improve the interworking of customer premises equipment and public enhanced 9-1-1 systems, as it may facilitate more effective and efficient communications between emergency services and South Carolina citizens.

¹ Public Notice Report No. 1922, released December 29, 1992.

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DIRM agrees with Adcomm that there exists a need to improve methods for the routing of Automatic Number Identification (ANI) from PBX's to the E-9-1-1 System Public Safety Answering Point (PSAP). DIRM has, however, several technical and non-technical concerns, for example, in many locations where PBX's are in use, the specific physical location of the phone number is subject to routine change. This adds to the difficulty in database upkeep when used with Automatic Location Identification (ALI), an option required of many E-9-1-1 systems. The PBX to 9-1-1 situation described in Adcomm's Petition is not new to E-9-1-1 implementation in South Carolina, and in many cases the database has been administratively managed. To not consider alternative non-technical solutions could lead to unnecessary financial and administrative burdens.

Additionally, DIRM is not prepared to endorse Adcomm's specific additions and changes to Part 68 of the Commission's rules. A preliminary review of Adcomm's proposal indicates that there may be incompatibilities between existing systems operations and the proposed modifications to the rules.² These inconsistencies carry the potential of placing technical and financial hardships on those citizens that E-9-1-1 is intended to serve. Until such time as DIRM has had sufficient opportunity to assess the technical and financial impact of new standards on existing and future systems, it will limit its endorsement to the

² Adcomm itself admits that its proposal does not "completely resolv[e] the problem." *Petition*, at 1.

concept of change itself. The Commission should do likewise in its response to Adcomm's Petition.

Resolution of the problem of inter-connectivity of PBX's and E-9-1-1 systems will require a coordinated effort between the vendor and customer communities. Cost and liability issues need to be considered, and those solutions most beneficial to the end consumer must be developed. Accordingly, the Commission, instead of issuing a Notice of Proposed Rulemaking based on Adcomm's Petition, should issue a Notice of Inquiry, requesting comments on the need for the change and expanding the scope of the discussion.

Respectfully submitted,

THE SOUTH CAROLINA BUDGET AND
CONTROL BOARD, DIVISION OF
INFORMATION RESOURCE MANAGEMENT

By: W. Kip Wood
Benjamin J. Griffin
W. Kip Wood
REED SMITH SHAW & McCLAY
1200 18th Street, N.W.
Washington, D.C. 20036

Its Attorneys

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