

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
Inquiry Concerning 911 Access, Routing, and) PS Docket No. 17-239
Location in Enterprise Communications Systems)

COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following comments in response to the Commission’s Notice of Inquiry (NOI) in the above-captioned proceeding.¹

Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 30,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems - including 911 Public Safety Answering Points (PSAPs), emergency operations centers, radio networks, and information technology - for law enforcement, fire, emergency medical, and other public safety agencies.

The Commission seeks comment on the capabilities of Enterprise Communications Systems (ECS), which serve environments such as office buildings, campuses, and hotels, to support direct 911 access, routing, and automatic location.² The NOI also inquires of consumers’ expectations regarding their ability to access 911 when calling from ECS.³

¹ Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems, PS Docket No. 17-239, *Notice of Inquiry*, FCC 17-125 (rel. Sept. 26, 2017) (“NOI”).

² *Id.* at para. 2

³ *Id.* at para. 3.

As the NOI explains, the E911 capabilities of ECS have been explored on numerous past occasions by the FCC and by Congress, and addressed to an extent by model state legislation and some progress at the state level.⁴ Yet despite all of these efforts, the general public and the 911 professionals that serve them still lack a comprehensive E911 solution for calls placed using ECS. APCO has consistently stressed the importance of requiring E911 capabilities for ECS. Hopefully, the breadth of this NOI, and the significant amount of data it seeks, will lead to a complete solution.

The fact that ECS still do not uniformly enable direct dial, call-back, routing, and location is a significant shortcoming in 911 emergency response. A member of the public facing an emergency will just dial “911” from the nearest landline phone or a cell phone and expect a rapid response. 911 professionals need all E911 capabilities in order to render emergency assistance in the most effective and efficient manner possible. Viewed from a public safety perspective, there should be nothing that sets ECS aside from landline, VoIP, or wireless service when it comes to meeting federal E911 obligations.

Direct Dial

Through voluntary efforts, state laws, and potential action by Congress, much progress is being made to ensure that the public can dial 911 from ECS without a prefix. Direct access to 911 is fundamental. A member of the public cannot even reach 911 if she does not appreciate or understand the need to dial a separate digit first. This must and can be fixed as soon as possible for all enterprises regardless of size or type.

⁴ *Id.* at paras. 4-16. Indeed, the Commission first initiated a proceeding exploring the E911 capabilities for MLTS in 1994 – 23 years ago. Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Notice of Proposed Rulemaking*, 9 FCC Rcd 6170 (1994).

Location

Importantly, the Commission asks how precise location information should be when a caller uses ECS to reach 911.⁵ Fundamentally, ECS is a wireline technology. Traditional landline telephones provide an exact, “dispatchable location,” which is the “gold standard” against which efforts to obtain a location for wireless 911 calls are compared. Thus, ECS should already be able to provide precise location information, whether through legacy or newer IP-based, cloud, and hosted solutions. The mobile and wireless nature of mobile phones present an inherently more complex case for providing location especially indoors. Yet the Commission, the public safety community, and the wireless industry clearly recognized the need to achieve a “dispatchable location” for indoor wireless 911 calls, culminating in a comprehensive set of rules and related industry efforts. Accordingly, APCO encourages the Commission to require location capability for ECS of the same quality as landline telephones, or at least the equivalent of its “dispatchable location” definition for wireless 911.

The Commission also seeks comment on whether MAC addresses associated with ECS could be entered in the National Emergency Address Database (NEAD) and used to help improve indoor 911 location accuracy for ECS.⁶ To the extent that there would be potential advantages to populating the NEAD with additional reference points afforded by ECS, such opportunities should be explored, so long as doing so does not impede the work presently underway towards improving wireless 911 location accuracy.

⁵ NOI at para. 22.

⁶ *Id.* at para. 31.

Routing

As the NOI recognizes, some ECS are configured to send 911 calls to an answering point within the enterprise, such as a campus police station or facility guard desk, and either simultaneously to a PSAP or not at all. Some ECS rely on remote call centers for calls that cannot be routed directly to a PSAP.⁷ The Commission seeks comment on the advantages and disadvantages of these types of configurations.⁸

Simply stated, failure to directly connect a 911 caller with the appropriate PSAP delays emergency response, and in some situations this can mean the difference between life and death. ECS should route 911 calls directly to the appropriate PSAP. Consumers should be able to reach 911 directly, be located, be called back if needed, and be rendered assistance as quickly as possible. Where an enterprise does not immediately route 911 calls to the appropriate PSAP, it should have a compelling reason and provide clear notice to any potential ECS users.

Conclusion

APCO welcomes the launch of this comprehensive inquiry into E911 capabilities for ECS. The Commission should strive to achieve direct access, call back, location, and routing capabilities for all ECS, regardless of the technology used, or the size of the enterprise. The same vigor being applied to solving wireless 911 indoor location should be directed at ECS. Following receipt of the comprehensive information and data sought in this NOI, the Commission should initiate a Notice of Proposed Rulemaking to establish rules requiring E911 capabilities for ECS that meet the needs of 911 professionals and consumer expectations.

⁷ *Id.* at paras. 23, 24.

⁸ *Id.*

Respectfully submitted,

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