

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Inquiry Concerning 911 Access, Routing, and	)	PS Docket 17-239
Location in Enterprise Communications Systems	)	

**Comments of the  
National Association of State 911 Administrators**

NASNA is pleased to offer these initial comments on the September 26, 2017 Notice of Inquiry concerning 911 access, routing and location in enterprise communications systems.

The National Association of State 911 Administrators (NASNA) represents state 911 programs in the field of emergency communications. NASNA believes that state 911 leaders' expertise can assist industry 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.

The comments submitted below are based upon a consensus of our membership and their collective experience with the provisioning of 911 services.<sup>1</sup>

**Direct Access**

Of great importance to NASNA is the need for access to 911 from enterprise communications systems (ECS) to be configured uniformly nationwide. Access must be direct, i.e., it must not require the caller to use a prefix, such as "8" or "9" before dialing the digits 911. Direct access must be required of every ECS everywhere. It is not reasonable to expect people who travel for business or pleasure to know every state's rules for access to 911 from these types of systems. Even when dialing directions are provided by an ECS operator, it is unlikely that a caller would take note of them in the heat of an emergency.

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<sup>1</sup> 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.

Furthermore, not all callers will be adults. It is particularly not reasonable to expect a child, who has been taught to call 911 for help in an emergency, to be hindered in any way by lack of direct access. The public should be able to call 911 from ECS the same way they would from their own phone.

### **Location Information**

It is very important to NASNA that ECS provide accurate location information. The Commission asked how precise that location information should be, i.e., should ECS provide the exact location of an office within an office building or an apartment in a multi-unit dwelling? We respond by asking the Commission to reflect on the measures it has taken to improve the location of 911 calls made indoors from cellular devices. The Commission's new location accuracy rules define dispatchable location as the "verified or corroborated street address of the calling party plus additional information such as floor, suite, apartment or similar information that may be needed to adequately identify the location of the calling party."<sup>2</sup> Why would ECS be held to a lesser standard of location accuracy? This is, in fact, the level of detail responders need in order to get help to the person who needs it.

### **Remote Call Centers**

The NOI seeks comment on ECS fallback provisions that involve sending 911 calls to a third-party call center in a remote location when the call does not include sufficient location information to route automatically to the appropriate 911 center. We cannot say what training the personnel at these call centers receive, what best practices are in place, or what information is available to them so they can get the call to the right PSAP. We don't know how many of them there are or where they are. We do know that sending the calls to a remote call center, even under the best of circumstances, inevitably delays the response. We have heard anecdotally from some of our members that there have been significant delays. If the comments filed in this proceeding fail to respond adequately to the Commission's questions and concerns, we would ask that you consider a targeted project that would engage the ECS providers and the remote call centers directly.

### **Costs and Benefits of Supporting E911**

The Commission has asked whether improving access to E911 in an ECS environment could improve the speed at which emergency personnel and services can reach the caller, with a resulting improvement in

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<sup>2</sup> FCC Fourth Report & Order, PS Docket No. 07-114, released February 3, 2015.  
<[https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-15-9A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-15-9A1.pdf)> (last accessed 11/07/2017)

the health and safety of the caller. NASNA's response is, "Of course it would." Just as E911 for landline, wireless and VoIP has resulted in improvements in the speed at which emergency responders are able to reach the caller, so would E911 for ECS. The magnitude of this benefit would be analogous to the well-studied, documented and proven benefits of E911 in general.

The NOI seeks input on whether there are any ECS environments, e.g., very small facilities, that would not benefit from additional E911 information. Some of the states that have adopted ECS requirements have set thresholds for location information based on the size or configuration of the facility, campus or building the ECS serves. That fact indicates that there are environments where additional location granularity is not necessary, and these environments are typically smaller structures.<sup>3</sup> For example, the Pennsylvania state 911 program's rules provide that business environments with less than 7,000 square feet on a single level, and located on a single contiguous property, are not required to provide more than one emergency response location. An emergency response location is a location that is specific enough to provide a reasonable opportunity for the emergency responders to quickly locate a caller anywhere within it.

### **Updating the Record on Options**

A quick survey of NASNA member-provided information reveals that there is no consistency on a nationwide basis. As Appendix B of the NOI reveals, not all states have ECS laws or regulations. Some state statutes deal only with the assessment of 911 surcharges on MLTS systems. Some more recent laws deal only with direct access to 911, i.e., "Kari's Law" and nothing more. Others' statutes attempt to establish threshold requirements for the provision of location information, but there is no common standard among these states.

The existing state statutes governing ECS do not reveal any uniform application or use of NENA's model legislation. The development and passage of laws occur within the political context. The interests of industry lobbyists are not always aligned with those of the state and local 911 authorities', and the resulting laws reflect their influence. Individual states are in the best position to advise the Commission as to whether they think their existing laws and rules have met their public safety goals. If the refreshed

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<sup>3</sup> See as examples the state of Maine's rules at [http://www.maine911.com/laws\\_rules/rules.htm](http://www.maine911.com/laws_rules/rules.htm); the state of Pennsylvania's statute at <http://www.legis.state.pa.us/cfdocs/legis/LI/consCheck.cfm?txtType=HTM&ttl=35&div=0&chpt=53>; the Commonwealth of Kentucky's statute at <http://www.lrc.ky.gov/statutes/statute.aspx?id=23496>

record in this proceeding should reveal that public safety interests, and by extension the interests of the calling public, are not being met with the existing state statutory frameworks, then it would be prudent for the Commission, state 911 administrators and other public safety entities to work together to find a better solution.

### **Conclusion**

NASNA believes (1) that it is essential that ECS be configured to allow direct dialing of 911, (2) that 911 calls must be routed to the appropriate PSAP with location information that is accurate enough for emergency responders to do their job, and (3) that on-site notification should be encouraged where appropriate. NASNA believes that this should be done consistently and uniformly on a nationwide basis.

If the Commission should decide to adopt regulations – and we believe that minimum requirements would be helpful – then we would respectfully ask the Commission to consider incorporating NASNA's positions on direct dialing, routing to the appropriate PSAP, and the provision of meaningful location information. Any FCC regulations should provide for states to adopt laws and rules that exceed the Federal requirements.

Thank you for the opportunity to offer our comments for the Commission's consideration.

November 15, 2017

Respectfully submitted,

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

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