

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

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

REPLY COMMENTS OF RINGCENTRAL, INC.

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I. INTRODUCTION

As a leading provider of Enterprise Communications Services (“ECS”), RingCentral, Inc. is firmly committed to robust and reliable 911 access for all ECS users. RingCentral supports the Commission’s effort to examine the complex ECS 911 landscape. In doing so, the Commission should take note of the variety of approaches to ECS 911 requested by ECS owners and ensure that these users continue to be free to work with providers to design and implement ECS 911 solutions that protect public safety and meet their particularized needs.

II. THE RECORD CONFIRMS THE IMPORTANCE OF FLEXIBILITY FOR ECS CUSTOMERS AND PROVIDERS.

The record in this proceeding demonstrates the importance of continued flexibility for ECS customers and providers. It is critically important that providers like RingCentral be free to innovate and improve services to adopt, for example, better interfaces and methods for customers to provide and update location information. Overly prescriptive rules can short-circuit this cycle, locking in current technology at the expense of innovation. Moreover, inflexible regulatory requirements may deny users the ability to tailor their ECS to particular workplace settings and network deployments.

Commenters agree with these concerns. AT&T has found that today’s ECS marketplace “is characterized by high levels of competition and innovation,” and that emergency calling functionalities vary as sophisticated ECS customers “seek tailored, often highly customized solutions to meet the telecommunications needs of the populations served by their ECS.”¹ TIA likewise notes, “[t]he diversity of enterprise users and system architectures in the ECS marketplace cannot be overstated” and cautions against any “‘one size fits all’ approach.”² More

¹ Comments of AT&T, PS Docket No. 17-239 at 1 (filed Nov. 15, 2017).

² Comments of the Telecommunications Industry Association, PS Docket No. 17-239 at 2 (filed Nov. 15, 2017) (“TIA Comments”).

specifically, TIA cautions against “generalizing the use of IP versus circuit-based solutions in the ECS marketplace...without considering the varying size and complexity of different enterprises making use of ECS equipment.”³ Verizon echoes these conclusions, detailing the critical role of ECS customers, and explaining that “service providers may be dependent on the enterprise customer itself” in key respects. For instance, because interconnected VoIP and telecommunications service providers often will not have a direct contractual relationship with an enterprise system’s end users, service providers may depend on the enterprise customer itself to notify end users of any relevant service limitation.⁴ West Safety Services likewise notes the range and variety of ECS deployments.⁵

The record likewise provides many examples of circumstances in which ECS 911 is appropriately customized to particular customer needs. The Boulder Regional Emergency Telephone Service Authority (“BRETSA”) details a number of settings in which emergency calls are appropriately routed to the premises served by the ECS.⁶ This includes military bases “which dispatch Military Police to incidents, while relating fire and perhaps medical calls to civilian authority PSAPs”; college campuses that maintain their own police force and dispatch center, requiring them to first route emergency calls from campus locations to the campus PSAP; and ski resorts that have to maintain their own dispatch centers to coordinate emergency response by Ski Patrol.⁷ Similarly, Ad Hoc explains that many of its member companies deliver

³ *Id.* at 2.

⁴ Comments of Verizon, PS Docket No. 17-239 at 5 (filed Nov. 15, 2017) (“Verizon Comments”).

⁵ See Comments of West Safety Services, Inc., PS Docket No. 17-239 at 10-13 (filed Nov. 15, 2017) (“West Comments”).

⁶ See Comments of the Boulder Regional Emergency Telephone Service Authority, PS Docket No. 17-239 at 5-6 (filed Nov. 15, 2017).

⁷ *Id.* at 5.

emergency services to a “full spectrum of potential workplaces” – ranging “from densely populated floors located in urban high-rise office buildings to multi-building suburban office park campuses to vast manufacturing facilities located in less populated areas” – that require tailoring plans to ensure employee access to emergency services.⁸

Like many of the other commenters, RingCentral believes that ECS customers and providers will continue to drive the development and adoption of ECS 911 solutions in ways that maximize public safety. Ad Hoc explains in detail how its members’ ability to customize 911 solutions serves the public interest. These entities are “best positioned to adopt the most effective solutions to enhance workplace safety for their companies in their particular localities,”⁹ in part because they understand the particular workplace safety needs of their enterprises.¹⁰ RingCentral’s experience confirms this observation, as its enterprise customers demand robust emergency calling solutions tailored to their particular enterprise needs. These solutions are designed to address challenges those customers have identified, frequently through long experience, and reflect those customers’ interest in protecting their workforce and the public. Verizon likewise notes the importance of “preserv[ing] enterprise customers’ ability to configure their voice services in a manner that best fits their business needs.”¹¹ For all of these reasons, RingCentral agrees with the Ad Hoc Telecommunications Users Committee that the Commission should “not . . . interfere with the wide discretion currently enjoyed by companies to develop solutions that best meet the safety of their employees.”¹²

⁸ Comments of the Ad Hoc Telecommunications Users Committee, PS Docket No. 17-239 at 5 (filed Nov. 15, 2017) (“Ad Hoc Comments”).

⁹ *Id.* at 2.

¹⁰ *Id.* at 3.

¹¹ Verizon Comments at 4.

¹² Ad Hoc Comments at i.

RingCentral believes it is in its customers' interests, and thus RingCentral's interest, to adopt emergency calling improvements as quickly as technology allows. Thus, like many providers, RingCentral has already voluntarily adopted direct 911 dialing of the type that would be required by Kari's law. Permitting continued flexibility for RingCentral and its customers will enable RingCentral to continue its efforts to provide each enterprise customer with the best emergency calling service possible.

III. LOCATION MANDATES FOR ECS WOULD BE PREMATURE.

The Commission should recognize, as TIA has explained, that determining location remains the "largest challenge" for ECS 911.¹³ Among other problems, as Cisco notes, "there is no single party that can resolve a caller's location in all cases."¹⁴ Commenters have described a variety of emerging ECS technologies and deployment models, illustrating the difficulty (and risk) of uniform regulatory requirements. Cisco explains that because the ECS market is so diverse and complex, the Commission "must avoid rules that apply indiscriminately, without accounting for technical feasibility, service variations, and end user expectations."¹⁵ Moreover, as TIA details, there is a risk that "onerous regulations" could unduly burden smaller ECS customers, including nonprofits.¹⁶ For all of these reasons, calls for specific ECS location requirements are premature.

Certain providers of location solutions nonetheless claim that location mandates could be met with little expense. But these assertions should be viewed with skepticism. West Safety Services, for example, asserts that it offers "cost-effective" solutions that can enable location for IP ECS while inviting the Commission to adopt requirements that would presumably drive up

¹³ TIA Comments at 5.

¹⁴ Comments of Cisco Systems, Inc., PS Docket No. 17-239 at 2 (filed Nov. 15, 2017).

¹⁵ *Id.* at 7.

¹⁶ TIA Comments at 5.

demand for West's services.¹⁷ Bandwidth similarly calls for federal ECS 911 mandates while touting the services it currently provides.¹⁸ These assertions run contrary to the experience of ECS customers and their service providers, which demonstrate that reliable and accurate automatic location solutions are simply not technically feasible today for non-wireless users. Critically, as it considers calls for federal mandates, the Commission should be careful to enable continuing innovation and competition among providers rather than dictating solutions that favor a particular provider or technology.

Finally, the record provides examples of steps the FCC can take today to update and improve upon existing rules. The Ad Hoc Telecommunications Users Committee echoes RingCentral's concern that the Commission's existing notification/warning label regime is not well suited to the enterprise VoIP marketplace.¹⁹ The Commission should consider granting greater flexibility to providers and their customers, as RingCentral and Ad Hoc have suggested.

IV. CONCLUSION

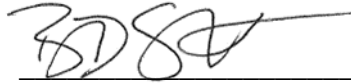
RingCentral recognizes the importance of robust 911 solutions for all users. For ECS providers and their customers, freedom to innovate and devise tailored solutions has enabled 911 approaches that protect public safety in a variety of enterprise settings. The Commission should ensure that ECS customers continue to have the flexibility to meet their particular needs, and avoid requirements that would restrict the ECS marketplace or favor particular providers or technologies.

¹⁷ West Comments at 12-13.

¹⁸ See Comments of Bandwidth Inc., PS Docket No. 17-239 (filed Nov. 15, 2017).

¹⁹ Ad Hoc Comments at 14.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "BDS", is positioned above a solid horizontal line.

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