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DEC 19 2016

October 18, 2016

Federal Communications Commission  
Office of the Secretary

Honorable Tom Wheeler, Chairman  
Federal Communications Commission  
445 12111 Street SW  
Washington, DC 20554

Re: Concerns Regarding Impact of 9-1-1-related Smartphone Applications and Related Public Safety Services on Delivery and Processing of Requests for Emergency Assistance

Dear Chairman Wheeler:

The National Association of State 911 Administrators (NASNA)<sup>1</sup> is interested and involved in activities that improve 911 service across our nation. The proliferation of smartphone 911 applications (apps) – which purport to “improve” people’s access to emergency services – concerns us greatly.

Our members’ real-world experiences with many of these apps are a large part of our concern.

For example, during testing in one member state, it was learned that one of these products enables the end-user to over-ride location information generated by the device and send a different location to 911. This capability increases the likelihood that criminals will abuse the 911 system and that lives may be endangered and resources will be wasted responding to fraudulent calls.

One app vendor was given an opportunity to brief NASNA’s board and staff. Subsequently, it published NASNA’s logo on its Website and promotional materials without permission, claiming NASNA had endorsed its product. Another app vendor, which had briefed FCC and Department of Homeland Security staff, placed these agencies’ logos on their promotional material, making it seem as though they had endorsed the product.

We are also concerned by the misleading claims made by some of these companies. For example, some make claims such as ‘911 location does not work from mobile phones,’ ‘cellular technology is unreliable,’ and that their app will get help to them faster and more reliably than simply calling 911. One claims to send the location information directly to ‘the closest’ first responders, which could cause a huge problem when what the app thinks is ‘the closest’ agency is not the one that is responsible for responding to that location.

We are also concerned about the potential risk to end users. For example, one app vendor’s solution delivers 911 calls as VoIP calls, and the normal wireless re-bid function cannot be performed when there is a need for a more precise location.

These and other operational and interoperability issues and questions remain unanswered because the regulatory system has not yet taken action to address the impact that 911 apps have on people’s access to 911 and on the

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<sup>1</sup> The National Association of State 911 Administrators (NASNA) is the voice of the states on public policy issues impacting 911. NASNA members believe 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.



911 system itself. NASNA believes it is appropriate and in the interest of public safety to ask the Commission to initiate a proceeding to address these matters.

Given the critical nature of 911 as the primary mechanism for the public to gain access to public safety services, NASNA respectfully requests that the Commission consider a proceeding to address the following concerns regarding how these applications and services interface with existing 911 systems, which include, at a minimum:

- Ensuring that what is being added by way of a new service will not harm in any way how consumers currently access 911 service from a smartphone, including slowing down the process of gaining access to the 911 system.
- Ensuring that 911 apps do not present a danger to emergency responders, or interfere or impede them in the process of responding to calls for service.
- Prohibiting the ability to enter and override location information generated by the device and enabling location data to be "spoofed" in a manner that displays information for the purposes of misleading the PSAP and first responders.
- Ensuring that the 911-related features of a new smartphone application or service have been thoroughly tested to specific standards, including interoperability and downstream dispatching considerations.
- Ensuring that 911 app providers are factually accurate in their marketing materials and do not mislead the public regarding how the product works, given the critical nature of 911 service and a request for emergency assistance.
- Prohibiting inaccurate claims from a 911 app provider that a state, regional, or local 911 governmental authority has approved, supports, or endorses, any particular product.
- Prohibiting inaccurate claims from a 911 app provider that the lack of cellular or broadband coverage in any geographic area is a failure of the state, regional or local 911 system.
- Ensuring that the addition of a "911 call button," a dedicated sequence of button use for 911 calling or texting, or buttons for individual types of emergencies, will not accidentally generate repeated pocket dialed 911 calls or 911 texts from the consumer.
- Limiting or prohibiting apps designed to generate duplicate requests for emergency assistance automatically (e.g., having the smartphone generate a separate text-to-911 message when a person dials 911; or automatically sending a smartphone location link in the body of a text-message that could be viewed as a malicious link; or automatically sending a pre-recorded message that may go on too long or indefinitely).
- Providing for the development of specific standards for communicating and displaying supplemental consumer or incident information in the context of a 911 call for dispatching purposes, with the intent of improving emergency response.



- Requiring adherence to industry standards for the interconnection to NG911 systems and ensuring that 911 apps use appropriate public-safety grade delivery networks and methods for message routing.

Thank you for your attention to these critical issues, which have a profound impact on public safety. NASNA's intent in providing this letter outlining our concerns is not to impede the development of smartphone technology and applications, but to ensure that it is done in a manner that safeguards accurate and timely responses to requests for emergency assistance. The issues our members and their PSAPs have experienced will only get worse unless something is done soon. We ask the Commission to favorably consider a proceeding to address these concerns. NASNA and its members stand ready to work with the Commission to develop reasonable solutions that will strengthen people's confidence that their call to 911 will bring timely help to their location.

Sincerely,

Evelyn Bailey  
Executive Director

Cc: Honorable Mignon Clyburn, Commissioner  
Honorable Jessica Rosenworcel, Commissioner  
Honorable Ajit Pai, Commissioner  
Honorable Michael O'Rielly, Commissioner  
Admiral (Ret.) David Simpson, Chief, Public Safety and Homeland Security Bureau