

December 28, 2016

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: PS Docket No. 94-102 Revision of the Commission's Rules To Ensure Compatibility with
Enhanced 911 Emergency Calling Systems

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Dear Ms. Dortch,

In June of 1999 the Commission issued an order adopting the “17 second” rule for analog phones that were used to call 911.¹ In July of 2004 the Commission again addressed the “17 second” rule for analog phones and clarified some details.²

Pursuant to the above cited orders, when an analog phone is used to call 911 if the preferred carrier for that phone cannot connect to the phone within 17 seconds then the phone will attempt to connect to a compatible carrier. However, the language in these earlier orders only refers to analog systems. The last analog wireless network shut down in 2008. Since that time all of the wireless phones and phone networks have been digital.

None of the language in the 1999 and 2004 orders cited above refers to the digital networks that exist today. In other words, there is no actual requirement that the phones and networks we all use today support the same “17 second” rule that applied back in the days of analog networks.

Hopefully the lack of a “17 second” rule for the digital age is simply an oversight that the Commission will promptly fix. The Commission should also request authoritative statements from the carriers showing that their digital networks are in compliance with this requirement.

Respectfully submitted,

/s/

Joseph Elfelt
20707 NE 120th St
Redmond, WA 98053
425-881-8017
josephelfelt@gmail.com
<https://MappingSupport.com>

¹ <https://transition.fcc.gov/Bureaus/Wireless/Orders/1999/fcc99096.txt>

² https://apps.fcc.gov/edocs_public/attachmatch/FCC-04-160A1.pdf