



Office of the Attorney General
State of Texas

DAN MORALES
ATTORNEY GENERAL

September 8, 1995

Office of the Secretary
Federal Communications Commission
1919 M Street, Room 222
Washington, D.C. 20554

RECEIVED
SEP 11 1995
FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

RE: *In the Matter of Telephone Number Portability, CC Docket No. 95-116*; the Texas
Advisory Commission on State Emergency Communication's Comments

Dear Commission Secretary:

Enclosed are an original and eleven (11) copies of comments filed by this Office on
behalf of the Texas Advisory Commission on State Emergency Communications. Please
distribute the filing as appropriate, and file mark the extra copy and return it in the enclosed
self-addressed stamped envelope.

Thank you for attention to this matter.

Sincerely,

Richard A. Muscat
Assistant Attorney General
State of Texas
Counsel for TX-ACSEC

\\shared\par\95-116c.doc

No. of Copies rec'd _____
List A B C D E

0210

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

In the Matter of

§
§
§

CC Docket No. 95-116

Telephone Number Portability

RECEIVED

SEP 11 1995

To: The Commission

FCC MAIL ROOM

**COMMENTS OF THE TEXAS ADVISORY COMMISSION ON STATE
EMERGENCY COMMUNICATIONS**

NOW COMES THE TEXAS ADVISORY COMMISSION ON STATE
EMERGENCY COMMUNICATIONS (TX-ACSEC), by and through the Office of the
Attorney General of Texas, and submits these COMMENTS in response to the
Commission's Notice of Proposed Rulemaking (NPRM) in CC Docket No. 95-116, Released
July 13, 1995.

I.

INTRODUCTION

1. In the 1970's, Basic 9-1-1 Emergency Telephone Service began to fulfill the
public's need for an easier and quicker way to elicit an emergency response from police,
fire, or emergency medical service. This service provided one easily remembered three-digit
telephone number to replace at least three seven-digit numbers, but it depended entirely
upon the ability of the caller to communicate by voice both the nature of the emergency and
the location where the emergency existed. Also, if the caller had not revealed the number
from which the call was being made, and the call was cut off, there was no way for the call
taker to reinitiate the call. Experience with Basic 9-1-1 soon provided numerous instances

where an appropriate emergency response was not possible because either the call was cut off, or the caller, for reasons of illness or even sheer panic, was not able to provide sufficient information for a successful response.

2. As a result of the inadequacies of Basic 9-1-1, a series of enhancements were developed in the 1980's to help solve the various problems that had been encountered. The telephone industry adapted the automatic number identification (ANI) scheme that had been developed for toll billing to provide the public safety answering point (PSAP) with the caller's telephone number. Then, the ANI number was used to query a database to produce the caller's address (automatic location indicator or ALI). Now, the call taker could dispatch someone to check out the emergency in the absence of any oral communication from the caller, and various television shows such as RESCUE 9-1-1 quickly raised the public's expectations as to 9-1-1's seemingly miraculous abilities.

3. The 1990's, however, have seriously challenged 9-1-1's ability to meet public expectations. Technological advancements, deregulation, and increasing competition have served to broaden the public's menu of economically priced telecommunications services, but at the same time have devalued 9-1-1 because its technology is fast becoming obsolete. ANI, in its use with 9-1-1, never fit into the mainstream of telephony. When ANI is used for toll billing purposes, as was originally intended, its coding is stripped off at the toll tandem. Thus, when it is used for 9-1-1, it must use dedicated trunks between the originating central office and the PSAP. In short, rather than using the public switched telephone network, enhanced 9-1-1 today requires a separate dedicated network.

4. TX-ACSEC certainly does not have all of the answers as to what needs to be done as far as number portability is concerned. It is apparent, however, that 9-1-1 must be considered up front as an integral part of every advance or change in telecommunications technology and regulation, not as a “bolt on” afterthought, as it has been in the past.

II

LONGER-TERM NUMBER PORTABILITY SOLUTIONS

5. TX-ACSEC strongly supports the Commission’s conclusion in ¶41 of the NPRM that a number portability environment must support enhanced 9-1-1 services. At this time, we have no preference as to which of the various proposals is adopted. However, the methodology must deliver a callable number to the PSAP which can also be used to query a 9-1-1 database for location information.

6. The questions that the Commission poses concerning ownership and administration of the number portability databases also must be answered for 9-1-1 databases in the context of competitive provision of telephone services. TX-ACSEC urges that any databases developed for number portability be required to easily integrate with 9-1-1 databases.

III.

INTERIM NUMBER PORTABILITY MEASURES

7. All of the measures currently available for interim number portability suffer the same weakness in failing to support enhanced 9-1-1 services. The ANI delivered to the PSAP is not the caller’s callable telephone number. And, as implied in ¶ 58 of the NPRM, the number provided through ANI is not a number that is normally known to the customer.

Thus, confusion arises when the PSAP call taker attempts to verify the caller's number. Also, 9-1-1 databases will have to be updated to associate the new ANI number with the caller's location.

8. While TX-ACSEC recognizes the probable inevitability of the use of interim number portability measures, we urge the Commission to recognize the problems they pose for 9-1-1. At very least, there needs to be a requirement for extensive education, both for the telephone customer and for PSAP personnel when these interim measures are implemented.

Respectfully submitted,

DAN MORALES
Attorney General of Texas

JORGE VEGA
First Assistant Attorney General

THOMAS P. PERKINS, JR.
Assistant Attorney General
Chief, Consumer Protection Division



RICHARD A. MUSCAT
Assistant Attorney General
State Bar No. 14741550
Consumer Protection Division
Public Agency Representation Section
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
Voice: (512) 463-2185
Fax: (512) 322-9114

g:\data\ram2\tx911.num