

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

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)

Telephone Number Portability)

CC Docket No. 95-116

RM 8535

COMMENTS OF NENA

The National Emergency Number Association ("NENA") submits these brief opening comments to (1) focus attention on the public safety importance of automatic location information ("ALI") in emergency calling and response, and (2) learn from the initial submissions of others whether the benefits of location portability (a) outweigh the loss of ALI efficiencies built into the current E9-1-1 public wireline network and/or (b) are worth the cost of interim measures to maintain ALI pending more sweeping solutions.

NENA was established in 1982 as a not-for-profit corporation to further the goal of "One Nation, One Number" (dialed 9-1-1) in calls for emergency assistance. Its 4500 members in all 50 states share the mission of advancing and implementing a universal emergency telephone number system.

In furtherance of this mission, NENA is taking an active role in CC Docket 94-102 which, in an analogous fashion, is examining the effects on ALI of the proliferation of multi-line telephone systems ("MLTS") and wireless telephony -- notably cellular and Personal Communications Service ("PCS"). In fact, there is reason to hope that the improved methods of wireless and MLTS caller location identified in that proceeding could enhance the future prospects of "location portability" discussed at ¶¶26-27 of the Notice here.

NENA is gratified at the Notice's tentative conclusion (¶41) that a number portability environment should support enhanced 9-1-1 features such as ALI,

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automatic number identification and selective routing of calls to the nearest source of emergency response. We can also understand and accept the general statement (§19) of the consumer benefits of number portability. But it is not clear to us, at this juncture, that each of the three types of portability is of such equal and pressing value as to demand the same speed of accomplishment.

Service provider portability and service portability may be important to customers whether or not they change their physical locations of telephone service. A fixed-address consumer's competitive shopping among providers, or choice to upgrade service, should not be impeded by the inconvenience of changing telephone numbers. From a public safety standpoint, if the physical location of service remains unchanged, the ALI capabilities of the present wireline E9-1-1 ought to remain intact.

On the other hand, location portability can be viewed somewhat differently. At least where address changes are inter-city or interstate, the consumer who moves today changes a lot more than his telephone number. He changes street number, driver's license and auto tags, children's schools, etc. And, as the Notice acknowledges (§67), both old and new telephone numbers, being geographically based, carry information about whether a call placed to them is local or long-distance.

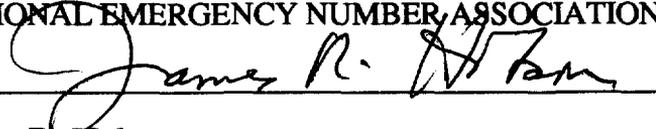
While the ALI functions in the present wire network serve public safety agencies reasonably well, they are not ideal. As pointed out (Comments, §§3,7) by the Texas Advisory Commission on State Emergency Communications ("TX-ACSEC") the Automatic Number Identification ("ANI") in use today originated as a call billing requirement. This leads to the inefficiency of dedicated trunks, not sized to traffic fluctuations, between central offices and Public Safety Answering Points ("PSAPs").

Ultimately, NENA expects that more advanced signalling technologies will allow E9-1-1 service to function entirely within the switched network. And by that time, what we will have learned about finding MLTS and mobile callers will provide new ALI techniques not dependent on the kinds of number-translating interim solutions discussed at ¶¶57-63 of the Notice.

The foregoing leads us to suggest that location portability (1) may not be as important to consumers as service provider or service portability, and (2) from a technological standpoint, may benefit from deferral in a period when other ALI solutions are ripening. From a public safety perspective, it could be argued that we ought to do as little as possible to disturb the ALI features of the existing wireline E9-1-1 network until we have something better to replace them. NENA would welcome reply comments directed at these tentative views.

Respectfully submitted,

NATIONAL EMERGENCY NUMBER ASSOCIATION

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