

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Telephone Number Portability)

CC Docket No. 95-116
RM 8535

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REPLY OF NENA

The National Emergency Number Association ("NENA") submits these reply comments in the above-captioned proceeding. NENA filed brief comments on September 12, 1995, hoping 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.

Numerous commenters echo the Commission's tentative conclusion (Notice, ¶41) that a number portability environment should support enhanced 9-1-1 features such as ALI, automatic number identification (ANI) and selective routing of calls to the nearest source of emergency response.¹ However, very few commenters suggest how to implement number portability without degrading enhanced 911 features. Both GTE and MCI claim that their solutions will preserve enhanced 9-1-1 service. Without passing judgment on either claim,

¹ Scherers Communications Group, Inc. (Scherers); United States Telephone Association (USTA); Bell Atlantic; MFS Communications (MFS); New York Public Service Commission; Nextel Communications, Inc. (New York PSC); US WEST, Inc. (US WEST); GTE; Association of Public-Safety Communications Officials-International, Inc. (APCO).

NENA urges the Commission to ensure that, whatever portability solution is adopted, enhanced 9-1-1 service is preserved without degradation.

The comments of Marion County, Florida illustrate the potential for enhanced 9-1-1 service degradation simply by increasing the number of steps that must be followed in order to provide ALI and ANI service. An ANI circuit set up time of up to 5 seconds and an ALI screen presentation time of up to 4 seconds could take even longer with the addition of multiple tandem routing switches and multiple database lookup tables. In an emergency, seconds count.

Furthermore, the use of multiple databases as a part of any solution will add a significant expense to many local budgets that are already financially strapped.² US WEST's conclusion that "if the public is to continue to enjoy the enormous benefits of E911 systems, public safety agencies will need to develop new means to maintain existing capabilities," (p. 18) is unrealistic. This burden must be shared by all and, until adequate solutions are developed, the preservation of enhanced 9-1-1 services should take priority over number portability.

Service provider portability and service portability need not adversely affect enhanced 9-1-1 service. Location portability, on the other hand, will render ANI and ALI service difficult, if not impossible. Until both services can be preserved without degradation, location portability should not be implemented.

NENA expects that, ultimately, more advanced signalling technologies will allow enhanced 9-1-1 service to function entirely within the switched network. By that time, there also may be new ALI techniques not dependent on the kinds of number-translating interim solutions discussed at ¶¶57-63 of the Notice. These

² Scherers at 2; Marion County at 1.

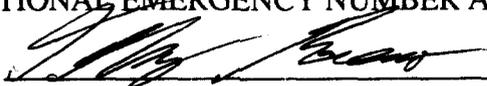
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solutions could allow location portability without degrading enhanced 9-1-1 service. It may be more desirable to await the development of this technology before implementing full location portability.

The first round of comments demonstrate a nearly universal opinion that number portability should not degrade existing enhanced 9-1-1 services. They also indicate that there are very few solutions for location portability that do not degrade enhanced 9-1-1 services in some respect. NENA urges the Commission not to accept any degradation in enhanced 9-1-1 service in exchange for location portability. Rather, if not currently available, the Commission should await the development of new technology which promises to free enhanced 9-1-1 from many of the constraints of the current network. From a public safety perspective, we ought to do as little as possible to disturb the ALI and ANI features of the existing wireline E9-1-1 network until we have something better to replace them.

Respectfully submitted,

NATIONAL EMERGENCY NUMBER ASSOCIATION

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