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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

OCT 17 10 1996

FEDERAL COMMUNICATIONS COMMISSIC.  
OFFICE OF SECRETARY

In the Matter of )  
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Request of the United States )  
Department of Justice That 311 )  
Be Reserved for Use by )  
Communities for Non-Emergency )  
Police Telephone Calls )

CC Docket No. 92-105

DOCKET FILE COPY ORIGINAL

**COMMENTS OF GTE**

GTE Service Corporation, on behalf of its affiliated domestic telephone and wireless companies ("GTE") hereby submits its comments regarding the request of the United States Department of Justice ("DOJ") that 311 be reserved for use by communities for non-emergency police telephone calls.<sup>1</sup>

**BACKGROUND**

In a letter dated August 26, 1996, the DOJ Office of Community Oriented Policing Services submitted a request to the Commission for the assignment of an N11 code, specifically 311, to be used nationally by communities for non-emergency police telephone calls. The DOJ also suggested that the 311 code could be used to provide access to other government services, at the discretion of individual jurisdictions.

<sup>1</sup> See Public Notice, DA 96-1500, released September 10, 1996.

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The Commission previously sought industry comment on the use of N11 codes and other abbreviated dialing arrangements in 1992 and again in 1994.<sup>2</sup> As a general matter, GTE maintains its position that N11 codes are a scarce resource that should be used for services that truly benefit the public at large. This same criteria has been used for years by the North American Numbering Plan Administrator ("NANPA") in assigning N11 codes on a national basis.

### **DISCUSSION**

Over the years, the public has come to associate particular N11 codes with specific services, such as "911" for emergencies and "411" for information. These services benefit the public at large and cost little or nothing for the individual caller to use. GTE supports this use of N11 codes. Whenever an N11 code is to be assigned on a national basis, however, care must be taken to ensure that the largest segment of the public will be served and that use of the N11 code will provide the greatest benefit.

In order to determine whether use of the 311 code is the best way to provide access to police in non-emergency situations, the use of alternative numbering arrangements (such as a uniform seven-digit number or 800 number) must thoroughly be explored. If an alternative numbering arrangement can provide the same or a better solution, the scarce N11 resource should not be used.

In this regard, it appears that the use of 311 is intended to address the problem of 911 being used for non-emergency calls. GTE is concerned that the problem of 911

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<sup>2</sup> See FCC 92-105, released May 6, 1992; FCC IAD File No 94-101, dated June 17, 1994.

being used for non-emergency calls may not be ameliorated through the introduction of a new 311 code. This is because it is not clear whether callers are simply ignoring the admonitions to use 911 only for emergencies, whether callers are unable to distinguish between emergency and non-emergency situations or whether they do not understand that 911 is not the police equivalent of 411. GTE is concerned that with the apparent lack of a concerted education campaign regarding the proper use of 911 *and* non-emergency public service numbers,<sup>3</sup> the introduction of yet another code for “non-emergencies” may only exacerbate the problem by further confusing the public.

Thus, for example, if part of the problem stems from the inability of callers to distinguish between personal “emergencies” and situations designated as 911 “emergencies” by their local police, it is not clear how a new “non-emergency” code will help clarify the distinction for them. Similarly, if callers believe that 911 is simply an abbreviated way of dialing the police, then a new code may be of little or no value in changing their habits. In other words, problems of this type, which stem from the lack of public understanding regarding the proper use of 911, will not be overcome through the introduction of a new code.

As a practical matter, will legitimate emergencies dialed to 311 be transferred to 911? If so, the 311 system likely will require the same caller identification capability used by 911 -- an extremely expensive proposition if undertaken on a national basis. In

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<sup>3</sup> The fact that 911 is dialed so often is actually a testament to the effectiveness of the 911 education campaign over the last few years. GTE believes that the same effort should be made to educate the public regarding existing non-emergency numbers before additional N11 codes are used. Such education campaigns should take place on both a national and local basis.

addition, a massive public education campaign will be required to (1) distinguish 311 from 911 in the minds of the public, (2) explain what will constitute legitimate 311 "non-emergency" situations, and (3) prevent 311 from becoming an extremely costly alternative to 411. GTE believes that before the 311 code is used and other resources expended for such efforts, all viable alternatives must be thoroughly explored and a record established regarding the results of those efforts.

Should it be determined that the use of a 311 code is the most effective way to address the problem of 911 being used for non-emergency situations, GTE recommends that an industry forum (such as the Industry Numbering Committee) be charged with investigating the most efficient and effective way to implement the code. This forum also should be charged with determining the viability of expanding the use of 311 to include other government services as suggested by the DOJ. A report of its findings should be filed with the Commission.<sup>4</sup>

## CONCLUSION

GTE supports the use of N11 codes when they serve the public interest in the broadest manner possible. Before a decision can be made to assign 311 for police non-emergency calls, however, alternatives to addressing the problem of 911 being used for non-emergency matters must thoroughly be examined. Once all options have been explored, if it is determined that using the 311 code is the best way to proceed,

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<sup>4</sup> Of course, if a decision is made to allow 311 to be used as requested, issues such as the parameters of its use, the manner in which it will be implemented, the manner in which implementation costs will be recovered, and the appropriate public education effort will have to be addressed.

implementation issues should be addressed by an existing industry forum and a report of its findings filed with the Commission.

Respectfully submitted,

GTE Service Corporation, on behalf of its  
affiliated domestic telephone and wireless  
companies

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**Certificate of Service**

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "Comments of GTE" have been mailed by first class United States mail, postage prepaid, on October 10, 1996 to the following parties:

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