

November 7, 2014

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

Re: PS Docket No. 07-114, Wireless E911 Location Accuracy Requirements; PS Docket No. 10-255, Framework for Next Generation 911 Deployment

Dear Ms. Dortch:

On November 5, 2014, I spoke with Louis Peraertz, Legal Advisor to Commissioner Clyburn, by phone.

Public Knowledge (PK) expressed its support for the Chairman's recently proposed items beginning the process of establishing rules to protect consumers during the phone network's technology transitions.¹ The Commission has unanimously acknowledged certain "core statutory values" that must endure in our communications networks throughout and after technology transitions: public safety, ubiquitous and affordable access, competition, and consumer protection.²

The FCC's October report on the April 2014 911 outage that hit seven states is a sobering reminder of what can go wrong in the transition to IP.³ New technologies can bring new capabilities and efficiencies, but can also present the risks of having less redundancy in critical components of 911 service. The FCC's report of the increasing prevalence of "sunny day" outages that impact multiple states only confirms that it is absolutely critical for the Commission to waste no time in ensuring its rules achieve reliability, transparency, and accountability among every entity that plays a part in providing 911 service.

¹ See Tom Wheeler, *Technology Transitions: Consumers Matter Most*, FCC BLOG (Oct. 31, 2014), <http://www.fcc.gov/blog/technology-transitions-consumers-matter-most>.

² See *Technology Transitions*, GN Docket No. 13-5, *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket No. 12-353, *Connect America Fund*, WC Docket No. 10-90, *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, *Numbering Policies for Modern Communications*, WC Docket No. 13-97, Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative at ¶¶ 1-4 (rel. Jan. 31, 2014).

³ See *April 2014 Multistate 911 Outage: Cause and Impact*, FCC Public Safety and Homeland Security Bureau (Oct. 2014), http://transition.fcc.gov/Daily_Releases/Daily_Business/2014/db1017/DOC-330012A1.pdf.

PK also urged the Commission to adopt strong wireless location accuracy rules for indoor calls to 911. In this area, the Commission need not choose between strong, expediently implemented rules now and long-term aspirational goals. PK is also concerned about reports that some officials and carriers are negotiating a private deal.⁴ PK urged the Commission to ensure the public has a meaningful opportunity to give input during the development and evaluation of any proposals for location accuracy rules, in addition to making sure the rules truly meet the needs of all users.

As we continue to move forward in the network transition, consumers and other end-users are looking to the Commission to ensure everyone still has access to a reliable network that will not fail when people need it most. PK urges the Commission to continue to ensure the network's core values will guide policy decisions throughout and after the transition.

In accordance with Section 1.1206(b) of the Commission's rules, this letter is being filed with your office. If you have any further questions, please contact me at (202) 861-0020.

Respectfully submitted,

/s/ Jodie Griffin
Senior Staff Attorney
PUBLIC KNOWLEDGE

⁴ See Letter from Claude L. Stout, Telecommunications for the Deaf and Hard of Hearing, Inc. to Marlene Dortch, FCC (Nov. 3, 2014), <http://apps.fcc.gov/ecfs/document/view?id=60000978499>.