



November 14, 2014

**Ex Parte**

The Honorable Tom Wheeler  
Chairman, Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

*Re: Telephone Number Portability, et al., CC Docket No. 95-116, WC Docket 09-10*

Dear Chairman Wheeler:

As a representative of Collier County, Florida Bureau of Emergency Service, I am writing to express my deep concern at the possible interruption, degradation, or cancellation of essential public safety services associated with the Local Number Portability Administrator (LNPA). Of concern also is the potential that public safety services could become fee-for-service operations. As you know, a vendor for LNPA services is currently being procured.

The current LNPA provides a service whereby 9-1-1 databases are updated regularly against LNPA data, to flag any users who have recently ported their service. This allows 9-1-1 providers to ensure that their own data remains up-to-date. Without this service, if someone who had recently changed phone carriers or their method of service (landline, VoIP, wireless) called 9-1-1, and for whatever reason they were not able to provide their callback number, location, or other key information to the operator, 9-1-1 could be severely challenged in locating them. And with a 9-1-1 call, every second counts – and any failed call could be a tragedy.

As a seasoned first responder with multiple hurricane responses to my credit, I have seen how crucial communication can be during disaster response and recovery. As you know, following both the attacks of 9/11 and Hurricane Katrina, the current LNPA facilitated the porting of thousands of numbers, which would otherwise have been inoperable due to destroyed or flooded switches. If this action had not taken place, business interruption could have been even worse after 9/11, and survivors of Katrina would have had even greater difficulty communicating with their friends and loved ones to plan their evacuations, their lives away from New Orleans, and their returns home.



I do not write to promote any particular LNPA vendor over another. But I do hope that the FCC will require that any vendor awarded the LNPA contract will be explicitly required to continue this 9-1-1 synchronization service at its current capacity and without interruption, and that demonstration of their capability to provide this service be formally presented in the proposal of any firm awarded the LNPA contract.

In so doing, I join my colleagues at the Oklahoma Corporation Commission, NENA, Intrado, TCS, and others who have argued for the importance of this service.

Furthermore, this essential public safety function provided by the LNPA helps save lives. All Collier County First Responders and others who rely on 9-1-1 – including, City of Naples Police and Fire and City of Marco Island Police and Fire – are constantly being asked to do more with less. Our focus should be on saving lives. It would be a significant and unacceptable burden if we were to be forced to pay new fees, whether on a subscription or per-use basis, simply to maintain our current confidence that 9-1-1 will work as it should.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan E. Summers', with a long horizontal flourish extending to the right.

Dan E. Summers, CEM, FPED  
Director Collier County Bureau of Emergency Services