

THE VOICE OF LAW ENFORCEMENT, PUBLIC SAFETY & CONSUMER PROTECTION

CALIFORNIA STATEWIDE LAW ENFORCEMENT ASSOCIATION

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The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

December 17, 2014

Dear Chairman Wheeler:

The California Statewide Law Enforcement Association is made up of over 7,000 members from over 180 different job classifications from around the state. Our members include DOJ Agents Alcohol and Beverage Control Agents, CHP 911 Dispatchers, Park Rangers, Fish and Game Wardens, California Dept. of Insurance Detectives, DOJ Criminalists, California Conservation Corps, State Lottery Investigators, and Fraud Investigators, agents in the field investigating and enforcing various laws.

As you are aware, the FCC's Local Number Portability Administrator (LNPA) provides three very important services that enhance public safety: the Local Number Portability Enhanced Analytical Platform (LEAP), data management for 9-1-1 call centers, and porting of telephone numbers from damaged switches to operational ones post-disaster. After July 15, the LNPA will no longer be required to maintain these critical features, which is deeply concerning to our organization. Below, we have outlined the positive impacts that these LNPA services have on the general public, as well as reasons for including them as vendor requirements.

9-1-1 Data Management

LNPA has provided essential data management for 9-1-1 call centers, allowing first responders to efficiently locate people during emergency situations. By synchronizing telephone numbers and locations across several phone service technologies, the LNPA makes Public Safety Answering Points (PSAPs) much more accurate with up-to-date information for the emergency management community. However, without this vital synchronization process, first responders may not have the necessary information to assist those in trouble, particularly those who may not be able to give their location, such as small children and unconscious victims.

Restoring Telephone Service Post-Disaster

Thousands of people rely on cell service to coordinate evacuations and contact loved ones post-disaster. Presently, the LNPA is tasked with ensuring that cell service is immediately available to those impacted by disaster, which immensely helps in fostering emergency response. When major disasters occur, local

switches where calls are routed become damaged, knocking out cell service. Nevertheless, this situation can be remedied if the LNPA reroutes the calls of impacted telephone numbers from damaged switches to functioning switches in other parts of the country. In the past, there has been much success with this system. For instance, after Hurricane Katrina, the LNPA rerouted more than 300,000 numbers, prompting states such as New York and Florida to integrate this capability into their own emergency management systems.

Local Number Portability Enhanced Analytical Platform (LEAP)

Over the years, LEAP has enabled police and federal agencies to track suspects' phone numbers, even when they switch cell carriers. Currently, the LNPA plays an essential role in maintaining the LEAP program so that law enforcement agencies on the local, state, and federal levels can prevent crime and acts of terror. This program is queried more than four million times per year and is a successful tool in bringing criminals to justice. If the FCC no longer requires the LNPA to provide LEAP, then the ability for law enforcement to pursue suspects will become much more difficult, putting public safety at great risk.

We hope that you and the Commission realize the significance of these services that the LNPA currently provides and how they contribute to emergency preparedness. Therefore, we ask that you consider reopening the request for proposal (RFP) period for LNPA, and ensure that these services are requirements, not options.

Respectfully,

A handwritten signature in black ink, appearing to read "Alan W Barcelona", with a long horizontal flourish extending to the right.

Alan Wayne Barcelona
CSLEA President
Special Agent - DOJ
(916) 447-5262

cc:

Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Reilly
Rear Admiral (ret.) David Simpson