

PS Docket № 13-75 & 14-193

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Before the Federal Communications Commission

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*IN RE*

911 GOVERNANCE AND ACCOUNTABILITY

IMPROVING 911 RELIABILITY

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*ON NOTICE OF PROPOSED RULEMAKING*

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**JOINT PETITION FOR EXTENSION OF TIME  
TO FILE COMMENTS AND REPLIES**

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ALLIANCE FOR TELECOMMUNICATIONS

INDUSTRY SOLUTIONS

ASSOCIATION OF PUBLIC SAFETY

COMMUNICATIONS OFFICIALS

INDUSTRY COUNCIL FOR EMERGENCY

RESPONSE TECHNOLOGIES

NATIONAL ASSOCIATION OF STATE 9-1-1

ADMINISTRATORS

NATIONAL EMERGENCY NUMBER

ASSOCIATION

UNITED STATES TELECOM ASSOCIATION

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The undersigned Joint Petitioners, respectively the Association for Telecommunications Industry Solutions (ATIS);<sup>1</sup> the Association of Public Safety Communications Officials, International (APCO);<sup>2</sup> the Industry

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<sup>1</sup> ATIS is a global standards development and technical planning organization that develops technical and operations standards for information and communications technologies (ICT). ATIS' diverse membership includes key ICT stakeholders, including wireline and wireless service providers, equipment manufacturers, competitive local exchange carriers, providers of commercial mobile radio services, broadband providers, software developers, consumer electronics companies, and internet service providers.

<sup>2</sup> APCO International is the world's oldest and largest organization of public safety communications professionals and supports the largest U.S. membership base of any public safety association. It serves the needs of public safety communications practitioners worldwide - and the welfare of the general public

Council for Emergency Response Technologies (iCERT);<sup>3</sup>  
the National Association of State 9-1-1 Administrators;<sup>4</sup>  
the National Emergency Number Association (NENA);<sup>5</sup>

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as a whole – by providing complete expertise, professional development, technical assistance, advocacy and outreach.

<sup>3</sup> The Industry Council for Emergency Response Technologies (iCERT) represents the voice of the commercial sector in the emergency communications field. Established by a group of prominent leaders in December 2005 originally as the 9-1-1 Industry Alliance, iCERT - the Industry Council - plays an important role as the voice of companies on public policy issues impacting 9-1-1 and the emergency response system. Industry Council members believe that business leaders' expertise can assist public policymakers and government emergency communications professionals as they address complex choices regarding advanced communications technology alternatives in the years ahead. Through advocacy, research and in coordination with the public sector, the Industry Council plays a vital role in the development and deployment of emergency response technologies.

<sup>4</sup> The National Association of State 911 Administrators (NASNA) represents state 911 programs in the field of emergency communications. Established in the early 1990's as a 501(c)(3) non-profit organization, NASNA is the voice of the states on public policy issues impacting 911. NASNA members believe that state 911 leaders' expertise can assist industry associations, public policymakers, the private sector, and emergency communications professionals at all levels of government as they address complex issues surrounding the evolution of emergency communications.

<sup>5</sup> As The Voice of 9-1-1™, NENA is on the forefront of all emergency communications issues. The association serves its members and the greater public safety community as the only professional organization solely focused on 9-1-1 policy, technology, operations, and education issues. With more than 8,700 members in 48 chapters across the United States and around the globe, NENA promotes the implementation and awareness

and the United States Telecom Association (USTA);<sup>6</sup> respectfully request that the Commission extend the time for filing comments in the above-captioned proceeding beyond the dates announced in its *Public Notice* issued January 22<sup>nd</sup>, 2015.

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On November 21<sup>st</sup>, 2014, the Commission released a *Policy Statement and Notice of Proposed Rulemaking* in these dockets. The *Notice* raises a large number of jurisdictional, governance, and legal authority questions with implications to every aspect of 9-1-1 service. Additionally, the *Notice* poses questions concerning a host of legal and technological issues involving 911 ecosystem entities necessary for completion of voice calls and other communications to 911, as well as those that provide automatic location information (ALI), automatic number information (ANI), location information services (LIS), text-to-911 capabilities, and the transmission of multimedia information in an NG9-1-1 environment.<sup>7</sup> These entities include several distinct types of communications providers, including originating service providers (OSPs), incumbent local exchange carriers (ILECs), system service providers (SSPs), subcontractors and vendors that provide additional technical capabilities, and PSAPs and emer-

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of 9-1-1, as well as international three-digit emergency communications systems.

<sup>6</sup> USTelecom is the nation's premier trade association representing service providers and suppliers for the telecom industry. Our diverse member base ranges from large publicly traded communications corporations to small companies and cooperatives – all providing advanced communications services to markets both urban and rural.

<sup>7</sup> *In re 911 Governance and Accountability; Improving 911 Reliability*, Policy Statement and Notice of Proposed Rulemaking ¶5 (Nov. 21, 2014).

agency authorities themselves to the extent that they provide 911 network components.<sup>8</sup> Given the scope and complexity of the issues raised in the notice, the Joint Petitioners believe that an extension of the comment filing deadlines would be in the public interest.

The Joint Petitioners recognize that requests to extend filing deadlines are not lightly or routinely granted. However, the Commission has previously found that an extension is warranted when it is necessary to ensure that the Commission receives full and informed responses and that the affected parties have a meaningful opportunity to develop a complete record for the Commission's consideration.<sup>9</sup> In particular, the Joint Petitioners seek an extension of time to permit interested parties to analyze the large number of complex issues raised regarding the effect of evolving network architectures on 911 governance structures and mechanisms to promote situational awareness, reliability and accountability across the nation's 911 networks. The Joint Petitioners welcome this discussion, and believe it is of paramount importance for the Commission to develop a full and complete record in this proceeding. Under these circumstances, Petitioners believe that a brief extension of time is warranted.

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<sup>8</sup> *Id.*

<sup>9</sup> *E.g.*, Public Safety and Homeland Security Bureau, *Order Granting Request for Extension of the Reply Comment Deadline*, DA No. 11-2049 (Dec. 21, 2011) (In *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications/Framework for Next Generation 911 Deployment*, (Docket Nos. 11-153 &10-255)).

## CONCLUSION

The Commission should extend the comment and reply comment deadlines in these proceedings to no earlier than March 23<sup>rd</sup> and April 21<sup>st</sup>, 2015, respectively.

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