

March 23, 2015

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

VIA ELECTRONIC FILING

Re: In the Matters of 911 Governance and Accountability, PS Docket No. 14-193 and
Improving 911 Reliability, PS Docket No. 13-75

Dear Ms. Dortch:

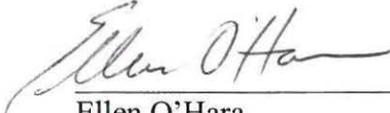
Zetron, Incorporated (“Zetron”)ⁱ respectfully submits the following comments in connection with the Policy Statement (“Policy Statement”) and Notice of Proposed Rulemaking (“NPRM”) adopted and released on November 21, 2014 by the Federal Communications Commission (“FCC” or “Commission”) in the above-referenced dockets.ⁱⁱ Zetron commends the FCC for its continued efforts to save lives and to provide federal leadership for emergency communications. Zetron supports efforts to promote the highest degree of reliability and resiliency for 911 services, and it looks forward to the opportunity to work with the FCC and others to achieve that goal. However, Zetron is concerned with a number of the proposals outlined in the NPRM and believe, if adopted, they would have a negative impact on innovation, competition and 911-related deployments including Next Generation 911 (NG911). Instead, Zetron recommends the FCC engage the industry in a collaborative dialogue to explore alternative approaches for improving reliability and resiliency, such as the development of NG911 best practices through CSRIC.

The specifics of Zetron’s concerns are well explained in the parallel submission of comments from The Industry Council for Emergency Response Technologies (“iCERT” or “Industry Council”)ⁱⁱⁱ of which Zetron is a member. Zetron is in agreement with the iCERT comments, especially in its concern that many of the proposed FCC actions would compound and expand regulations which would impede development of products and deployment of services.

Zetron recognizes the Commission’s sincere efforts to improve the performance and reliability of 911 services. However, regulatory mandates that might impede technical innovation or slow network deployments are unlikely to improve 911 services. Such mandates are even more problematic when they threaten to change the governance framework of 911 services, which is generally delegated to the States. To the extent that the Commission can encourage best practices and can establish an environment that supports collaboration, innovation and the important role of the States, Zetron believes that the Commission’s goals will be better served. When a 911 network impairment occurs, collaboration can be critical to improving time-to-resolution; and the FCC can play a strong role in encouraging best practices and collaborative

communications. Zetron looks forward to working with the Commission, the public safety community, and other industry stakeholders on such an initiative.

Respectfully submitted,



Ellen O'Hara
Chief Executive Officer

ⁱ Zetron, Incorporated is a manufacturer of mission critical communications equipment used by the nation's public safety agencies, including E9-1-1 and NG9-1-1 call taking equipment. Zetron is a wholly owned subsidiary of JVCKenwood. <http://www.zetron.com>

ⁱⁱ See *In the Matters of 911 Governance and Accountability*, PS Docket No. 14-193 and *Improving 911 Reliability*, PS Docket No. 13-75, adopted November 21, 2014, Rel. November 21, 2014.

ⁱⁱⁱ Established by a group of prominent business leaders in December, 2005 originally as the 9-1-1 Industry Alliance, iCERT plays an important role as the voice of commercial public safety companies, wireless carriers, and related vendors on public policy issues impacting 9-1-1 and the emergency response system. iCERT's membership is diverse, and many of its members not only have differing business objectives, they may be direct competitors. All of iCERT's members agree that an invigorated vendor community engaged in frequent two-way dialog with public safety officials, regulators and policy makers is indispensable to creating the highest quality emergency services for all Americans. Industry Council members believe history has demonstrated that business leaders' expertise can assist public policy makers and government emergency communications professionals as they address complex choices regarding advanced communications technologies. *See*, <http://www.theindustrycouncil.org/index.cfm>