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I am opposed to changing the requirements to route all 911 calls, as someone will die if they cannot get thru.

While the problem of invalid calls is an issue, a simple changing of the rules to allow blocking of JUST those phones that are associated with multiple false calls to 911 should eliminate most of the problems that the advocates of this proposal are stating without adverse problems for other innocent users of NSI phones.

Network issues often have 911 calls routed on networks that are not native or roaming partners of the phone. Network outages can also prevent a carrier from learning the true NSI status of a phone. Therefore carriers under this proposal may block these phones, even though they have service since they might be unable to determine this fact. Further, millions of phones have been given out under the lifeline program, and nearly all these phones have a limited number of minutes per billing period. It is my understanding that when these phones run out of their minutes, they not only will not be able to place regular calls, but also that their 911 access will be blocked as well.

A compromise position might be to block only those phones that have not had active service for the last 6 months or so. This would take care of the children play phones, while allowing prepaid persons who just ran out of minutes to place 911 calls. This would also allow phones used in emergencies without sim cards installed to be used, as long as an active sim had been used in the last 6 months in that phone.

However, I still believe that all calls should be passed to all psap's unless a specific phone is requested to be blocked by a specific psap. I think the rules should be changed to make it more clear of the right of a psap to block such phones from calling such psap after multiple false calls and this should take care of the majority of the false traffic to a specific psap. However, I believe that the rule should also provide that these blocks placed by a psap should be withdrawn whenever 6 months elapse from their placement, or whenever the phone in question becomes an active phone on any network. I have seen nothing in the record that reflects that these false calls routinely extend to multiple psap locations to justify a network wide block of a specific phone. Since "kiddie phones" are generally not very mobile, a psap blocking rule would be very effective at stopping most false psap traffic, without prohibiting the traffic from others in a true emergency where the rule proposed would otherwise bar their call from even reaching 911.

In other words, The ability to reach 911 is more important than the problems foisted upon the psap's and thus I believe that most 911 calls should be routed, except in those specific cases of abuse.

I guess if this is adopted, I should give up on cell phones in emergencies, and rely on Ham Radio instead.

Thanks for reading my comments.