

60001047434.txt

In reviewing the information in the Federal Register notice, I do not believe that banning NSI 911 calls is the answer. First, doing so eliminates the possibility of legitimate 911 calls from being placed using these devices, likely resulting in death, injury, loss of property, or some combination of these outcomes, particularly when commenters such as Maryland cite rates of 30% or more of calls from such devices being legitimate. Second, I believe that the petitioners and the FCC completely ignore the implications of devices being operated on prepaid services. While inexpensive, these prepaid services usually operate on a monthly or quarterly basis, and the service for a particular device automatically expires at the end of the service period unless renewal payments are made immediately at that time. Failure to make such payments results in loss of service, turning these devices into NSIs; it is not so much a matter of cost (although it can be in some cases), but carriers being strict about meeting expiration deadlines and consumers (for a variety of reasons, including forgetfulness) failing to meet the required payment deadlines. A more rational and reasonable alternative is to block calls from fraudulent devices, AND for carriers to provide a means of tracing calls to a specific device or location, or providing location information automatically, whether a device is NSI or not. The use of 911+ESN/IMEI should allow the blocking of fraudulent calls from these devices and combined with location information should allow for identification and prosecution of callers using these devices maliciously or fraudulently.

I urge the FCC to retain 911 capability for NSI devices, and to require that carriers provide blocking capability as required, and location information. This is the proper course of action to balance the need for the ability to contact 911 emergency services against the current environment where malicious or fraudulent activity is rampant. However, I do support eliminating 911 capability for devices that are no longer supported by carriers' infrastructure (i.e., 2G phones when 2G service is no longer provided). In that case, it is really no different than a device being in an area without service, or the service not operating properly (i.e., issue in central office, wiring issue, device being out of power, etc.).