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Public Comments on 911 Call-Forwarding Requirements for Non-Service-Initialized Phones:========

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This comment is in regards to the E-911 call forwarding requirements for non-service-initialized (NSI) phones. In this comment, I would like to point out some potential edge cases involving vulnerable population groups that I believe necessitate continuing these call-forwarding requirements, at least in some form.

The first vulnerable group consists of the unhoused, and those technically housed but very poor, including some elderly. These individuals may be unable to afford or affect phone service in any form, but with an NSI phone may at least have an emergency contact. In an age of cellphones, where pay phones and other public telephone access is being largely phased out, if not for the NSI option many people in these populations would then subsequently have little or no access to emergency services, and as a result would lead to a nonzero amount of additional injuries and deaths that would not otherwise have occurred if the NSI option was in place. It is my opinion that from a moral and ethical standpoint, adopting a policy that will lead to actual harm for vulnerable populations should only be implemented if the benefits to society vastly outweigh that harm, and based on the evidence presented in this proposal, I do not believe that the benefits in this case would outweigh the harms presented to these vulnerable populations by making it that much more difficult for them to reach emergency assistance.

However, this is not the only edge case to consider. We also live in a society where dedicated landlines are fast disappearing, along with the safety net they provide in a large-scale community crisis or natural disaster. As it stands now, actual landlines remain active for several days of power loss, which is common in a disaster, while equivalent VOIP solutions or primary cellphones will often run out of charge within hours. As a result, many families, as part of their disaster-response kits, keep with them an old cellphone and charged battery, to at least allow them access to emergency services if their primary mode of telecommunications has lost charge. Removing the NSI requirements would take away this secondary

precaution, placing more of the population at risk during disasters involving extended loss of power. Admittedly, this problem could be resolved by other regulations (such as requiring longer battery-backup times for VOIP services); however, those recommendations are beyond the scope of these comments, and assuming that no action is taken in other areas, the need for NSI phones as a backup in a natural disaster remains important.

Another edge case involves victims of domestic violence and abusive, controlling relationships. People in these relationships may have extremely limited financial autonomy, which could make buying even a basic cellphone and plan difficult, especially if said plan would require notification of the abusive spouse, who could then terminate the transaction. However, an old cellphone can often go overlooked, and can then be hidden in plain sight by an abuse victim, while still allowing them access to emergency services if the situation becomes dire. Eliminating the NSI access requirements could potentially leave people in these situations with no way to contact the authorities, placing a group already at significant risk of violence in an even more precarious position.

Obviously, there are counter-arguments to these points, and to the fact that the same system that provides assistance to these populations is also open to abuse by unscrupulous individuals, disrupting the efficiency of call centers and providing the possibility of congestion/denial of service attacks. This is not something to be taken lightly, but at the same time, accounts of those who work in the emergency services seem generally of the opinion that if there is a policy that allows them to save even one more life, it is worth doing, even if it causes them some aggravation. It is an opinion that I share, although it is also true that the current inability of NSI calls to E911 to provide basics such as location data is a security concern that should not be taken lightly.

I would propose, then, a modification to the NSI requirements that would both maintain emergency access to phones without a paid subscription

plan, and provide 911 dispatchers with better information. The modification would involve creating a method to effectively "initialize" service on current NSI phones to a limited state on whatever network they are designed to hook into. Ideally, this process should be able to be performed entirely on the phone, and should be reasonably simple to set up. This initialization would allow the phone to be identified on the service, but would only allow calls to 911 (and, ideally, to 211 social-support services as well). This would allow previously-NSI phones to provide E911 centers with better information (such as GPS data), and such information, and the ability of authorities to arrive at the phone location, should cut down significantly on malicious abuse of the service. It is true that such a plan would impose some additional marginal costs on the carriers, but these could be likely defrayed by an increase of a few cents in the 911 provisioning fees on most cellphone bills.

In the absence of such a plan, however, I would encourage the Federal Communications Commission not to remove the call-forwarding requirements for NSI phones. While allowing this call forwarding does involve some risks, I believe that the benefits they provide to at-risk populations in our community are still significant enough that maintaining the program is worthwhile.