

I propose an answer below that would help ALL PSAP's who choose to do so to control abuse calls of ALL types at their PSAP. This idea is to amend the rules to make clear that PSAP's are entitled to block or degrade calls from ANY phone that has placed multiple abuse calls to 911 other than paystations for 6 months. Such blocks will be under the control of each PSAP and will not involve any expense by any wireless carrier. Further, this idea will stop most abuse calls of both NSI and Non NSI phones, and not require the changing of the expectation that all phones can call 911. In fact, all phones except the abusing phones will be permitted to call 911. I Define "Degrade" to mean place that call in a low priority queue such that they are never answered unless there are staff available that would be otherwise be idle and bumping that call if another emergency call arrives with no more agents available. Degrade should be the better option if the PSAP equipment permits. Block should be used only if degrade is not available, or maybe if that phone is above some large threshold of false calls.

I have been reading the comments of the majority of the people posting here and believe that these people, like myself are opposed to cutting off ALL access to 911 from NSI phones. There has been a clear expectation since the invention of the telephone that ANY phone capable of summoning aid be required to do so. In fact, the very first call placed on a telephone was a call for help, because of acid being spilled by the inventor. This rule first began with telling the operator the emergency with manual service and being connected to the emergency service, thru laws that required a party line to be given up to an emergency call, thru the dial tone first rules of pay telephones that allowed connecting to emergency without coins, either thru 911 or the operator, to the current rule being considered for elimination which is the requirement that mobile telephones must be able to connect to the emergency services even if they are not currently able to call anywhere else due to lack of minutes or a subscription. This is a public service requirement that has been imposed on the Telephone network from the beginning and should not be withdrawn, because it serves the public good.

The clear reason for the default 911 access without any screening was that the systems that validate the Subscription status can often fail, or in fact do not exist when a 911 call is routed over a wireless network that is not a roaming partner of the native service provider of the phone used. Since it is unknown which network will be used to deliver an emergency call, universal 911 transmission is the best and only answer and needs to remain, subject to the right of a PSAP to block as outlined below. My proposal still requires delivery of all calls by the carrier, only the PSAP has the right to block or degrade after delivery.

I suspect that various PSAPs and the groups that represent them are promoting this action because of the hope that it might reduce the workload of the call centers, and does not seem to

care that ANY proper use of 911 by anyone should be a good reason to leave the rules alone and to allow all 911 calls except as allowed for specific abuse of a PSAP. I note that abuse of the 911 system is not limited to NSI phones, and therefore I am sure that almost every PSAP has its share of problems in this area.

I do agree that multiple abusive calls to a PSAP from a SPECIFIC phone should be a good reason for limiting that SPECIFIC phone's access to 911, and the FCC should make clear in its rules that specific PSAP's ARE allowed to block or downgrade calls from specific phones that have abused 911. This idea to downgrade or block abuse calls is not in fact limited to NSI calls, and PSAP's should be allowed to do the same to ALL abusers of the system, even if the call is not from an NSI phone, and this would include abuse from landlines, businesses and subscribed mobile phones. It would be a problem though to block paystations, but this phone type is getting rarer by the day. I also feel that this type of block should be removed after 6 months since last abuse. There is also an outside chance of a false block, and thus some kind of appeal is needed. The reasons for a false block include: 1) Blocking on only last 7 digits might block other phones that did not abuse 911, but happen to have the last 7 digits of its serial matching someone who has, and 2) It is my understanding that in the days prior to expansion of the meid/imei to more digits, that there has been number reuse and more than 1 phone with the same number due to reuse and 3) Just because a phone has a cloned meid/imei should not be a reason to deny access to the emergency services, as this call is important as well.

In the past filing of the group that is now promoting this proposal, the group talked about PSAP's that downgraded calls to the lowest priority by a local blacklist at each affected PSAP. This group thinks blocking or downgrading is allowed, but would like that rule to be made more clear. This time instead of suggesting almost exactly what I suggest, they want to just BAN these phones outright so that they do not have to deal with the issue at all and ignore the public interest in allowing 911 access. This has the effect of limiting the emergency number to ONLY those who can afford a subscription.

It is my understanding that the identity (or partial ID) of each NSI phone is already sent to the PSAP answering the call. It is in the form of 911-xxx-xxxx where xxx-xxxx is the last 7 digits of the msid/imei used, and that in another field the complete number is also provided. Provided the FCC changes the rules to make clear the right of a specific PSAP to block or degrade calls, each PSAP would have a legal choice if it feels it is being abused to install and operate software to block or downgrade these calls. This way ONLY the PSAP's that feel there is an issue with abuse need to invest in technology to block the calls, and neither the carriers or other PSAP's that do not see this as an issue would have to incur expense.

I notice that the statistics for the need for repeal of this rule seem to be cherry picked by the association. NOWHERE do I see any evidence presented that show that this is a national issue, rather the evidence seems to indicate that there is an issue with false calling at specific PSAP's by specific phones repeat calls to 911. Further, even at these "abused" PSAP's, there is still indication that there are still valid emergency calls being made on other NSI phones. There also has been no evidence submitted that would indicate that these abusing phones are moving around and placing calls at more than on PSAP, such to require some form of national block. I also think some kind of national statistics on abuse with non-NSI phones should be presented as well, as I am sure abuse is not so limited.

I also note that many law enforcement have cell phone simulators such as the stingray made by the Harris Company of Melbourne FL, and these agencies have used these devices to go after persons who have stolen phones. These devices, with the appropriate court order could clearly be used to locate serial abusers of the 911 system by physical tracking and a few arrests of such persons might have a big deterrent effect on others that are abusing 911.

In Summary

- 1) Keep NSI access to 911, as it clearly has a public benefit.
- 2) Allow PSAP's to block or downgrade calls from abusive callers for 6 months.
- 3) Change the rules if required to track down serial abusers, maybe even getting hams or the FCC Tiger Team involved to track down and arrest the biggest abusers.

I invite anyone who wishes to discuss this issue to contact me at fcc.gov@8u.nu

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