

# NENA

## The 9-1-1 Association

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1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

July 6<sup>th</sup>, 2015

RE: 911 Call-Forwarding Requirements for Non-Service-Initialized Phones,  
PS Docket No. 08-52.

Dear Ms. Dortch:

Although NENA: The 9-1-1 Association understands the concerns of the few parties who oppose the phase-out of the Commission's "NSI" rules, we remain certain that a speedy end to those rules offers the surest and best means to improve the safety of the general public.

It is true that some domestic violence victims' assistance organizations continue to distribute NSI devices to ensure their clients' access to 9-1-1. However, NENA is convinced that the availability of donated devices with service, subsidized "wireless lifeline" service, and low-cost prepaid service each constitutes a superior and readily-available substitute for NSI calling.

Likewise, while we understand the rational desire of carriers to avoid changes to their networks that may be required to disable the NSI calling feature, the costs to the public of maintaining the *status quo* – both in dollar terms and in safety and security terms – are clearly greater.

In the absence of meaningful alternative proposals, then, NENA urges the Commission to issue a Report and Order sun-setting the NSI rules as soon as practicable.

Sincerely,



Telford E. Forgety, III; "Trey"  
Director of Government Affairs  
& Regulatory Counsel