

June 9, 2016

Notice of Proposed Rule Making

PS Docket No 08-51

FCC Commissioners:

The Woodbury County Communications Center in Sioux City, Iowa is a PSAP that provides 911 services and consolidated dispatching to the citizens of Woodbury County, Iowa. We are a consolidated dispatch center that dispatches all resources including police, fire, emergency medical and general service providers.

We strongly support the Notice for Proposed Rulemaking Non-Initialized phones proceeding, PS Docket No. 08-51 ending the requirement for all wireless carriers to forward calls from these phones to 911. We began tracking the number of abandoned 911 calls we received from uninitialized phones July 1, 2010, we knew that we received a lot of calls from these phones but really did not understand the scope until we started to track the numbers.

The following shows the number of abandoned 911 calls (these calls range from calls where no one is on the line, no one will speak to us or prank calls- any call that disconnects before a dispatcher can determine if there is an emergency). Many of these calls are malicious and we are unable to locate a caller and very few result in the request for any emergency services. These calls take away from actual emergency calls and delay answering of those calls. We routinely get multiple calls from the same phone.

	Wireless 911 hang-ups- all hang-ups	Wireless 911 hang-ups- from un-initialized telephones
FY11	11,639	5,013
FY12	14,747	5,981
FY13	14,105	3,778
FY14	13,528	4,757
FY15	14,770	4,536

We strongly believe it is time to end this requirement and support this proposed rulemaking.