

Metrocare
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15-Oct-2001

Federal Communications Commission
Washington, DC

via electronic filing by e-mail

comments in regards to: CC Docket No. 91-281, file # NSD-L-01-153

These comments are in response to a filing by Insight 100 with the FCC on 13-Jul-2001 requesting a waiver of the privacy flag restriction as it applies to Caller Number Identification Service (CNID) and Calling Party Number (CPN).

Inasmuch as our company, Metrocare, is an emergency medical service provider, both directly and in conjunction with other agencies, we believe we have the experience to make an educated reply to their petition.

Insight 100 points out that their members provide emergency services to callers, and would therefore find unrestricted CPN a useful adjunct in expediting the delivery of such care.

In effect, they claim, they should have the same access to CPN as is available to the more official Public Safety Answering Points (PSAPs), commonly referred to as "911 centers".

(It should be noted that standard CPN does not quite always provide the same information as e-911, but the concept is the same).

With some minor qualifications, we endorse the Insight 100 proposal. Inasmuch as the originating caller is requesting immediate assistance, all available technical steps should be taken to facilitate such response. The removal of the CPN block would significantly assist the providers in rapidly ascertaining the caller's phone number and location, and would simplify other related actions.

We are, however, in some slight disagreement with them over the scope of the request.

Insight 100 is lumping together all calls which they believe require action. However, we feel that privacy issues mandate, as much as possible, a separation of calls into two groups. The first comprises those in which a person is making a request for emergency assistance. The second is composed of the others which Insight 100 cites. A caller requesting aid has given implicit approval to the backtracking. Other callers have not.

Therefore, an annoying or even a threatening call, in and of itself, should not be sufficient cause to bypass the CPN block without specific legal procedures such as a subpoena.

We recognize that it is impossible to differentiate the calls before they're answered. Accordingly we suggest that full CPN be delivered to phone lines that are commonly understood by the public to be used for emergency contact, and that the other phone lines in the system be treated in the standard manner.

As an example, the "emergency" number, whether it reaches a nursing desk in the emergency department, an ambulance station, or a security office, should receive CPN even when the outgoing line is trying to "block" it.

However, calls to the accounting division or any other "routine" area should have their CNID handled the more traditional way.

Sincerely,
Daniel Berns

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