

CC Docket 94-102 /

From: "Jonathan Gael" <gael@911pbx.com>
To: <jboley@fcc.gov>
Date: 1/7/02 8:53PM
Subject: Public Response, 911 Act

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Boley,

Please pardon any format irregularities, as this is the first time that I am responding in this type of forum. That being said, I would like to point out the importance of an oversight that I believe to be as important, if not more important, than the constant mentioning of wireless issues surrounding compliance with the 911 Act. I believe that the commission should mention in no uncertain terms that it is equally important for companies with multiple floors, or with multiple buildings (campus environment) to employ customer premise equipment that can report exact location information.

Typically, the information reported to a Public Safety Answering Point (PSAP) by a carrier will give a billing address or a main address where the company's multi-line telephone system (MLTS) is located. If the MLTS is in use for multiple locations, however, the lack of information provided to the PSAP can be devastating to the victim placing the 911 call.

I believe that the State of Washington has required that companies in this sort of multiple floor or multiple building environment remedy this problem, however, while there is mention of comprehensive infrastructure solutions and comprehensive State solutions, no mention of this specific problem is made in the commission's report. I firmly believe that while the Federal government and the State governments should be developing comprehensive plans for public safety surrounding the 911 Act, some of the responsibility to upgrade systems will have to be shouldered by not only the public safety entities and the carriers, but also by the business enterprise. It should be noted that companies like MicroSoft have already installed exact location reporting solutions to increase public safety on their 60 building campus, and that similar companies across the nation should follow suit.

Thank you,

Jonathan Gael

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