

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Revision of the Commission's Rules to	)	CC Docket No. 94-102
Ensure Compatibility With Enhanced 911	)	
Emergency Calling Systems	)	
	)	

TO: The Commission

**COMMENTS OF THE KING COUNTY E911 PROGRAM**

The purpose of this letter is to provide comments in response to the Commission's request related to requiring providers of various services and devices to provide access to emergency services.

The Commission has asked whether several classes of providers should be required to comply with basic and enhanced 911 requirements, or similar requirements. The Commission has proposed that each service or product be evaluated based on the criteria that guided the decisions outlined in the E911 First Report and Order. In addition to evaluating the services or products based on this criteria, King County proposes that if a service or product is determined to be appropriate to have access to 911, and can make a 911 call that is routed to a PSAP, that service or product must be capable of meeting the enhanced 911 requirements of providing a call-back telephone number and the location of the device making the 911 call. It is unacceptable for 911 calls to be routed to PSAPs without also providing them with the

information they need in order to provide service to the caller. This has been the case with wireless 911 service for the past several years. The lack of information has had a significant impact on PSAP staff time, and has prevented or delayed emergency responses to many wireless 911 callers. If new telecommunications services are determined to be appropriate to have access to 911, they must be required to provide the necessary information along with the call to make an emergency response to the caller's location possible. In addition, each service and product must be clearly labeled and accompanied by information to the subscriber that specifies the 911 capabilities of the device. Again referring to wireless 911, many wireless phone users believe that the PSAPs have the same information available to them on wireless 911 calls as on wireline 911 calls. They have the expectation that they can be located by emergency responders even if they are unable to provide their location. With new telecommunications services, subscribers should be clearly informed about the 911 capabilities of the device so they do not have unrealistic expectations when they call 911 in an emergency.

Regarding Mobile Satellite Service (MSS), we believe that satellite phone users may have the expectation that they can call 911 from their phone to access emergency services. Given the current technical difficulties of locating satellite phones and connecting to the public switched network, it is appropriate that these calls be directed to private call centers at this time. If the call requires emergency assistance, the call center would transfer the call to the appropriate PSAP. We do have concerns about the existence of an accurate national database of PSAPs. We have encountered a variety of entities who claim to have a PSAP database, yet do not have accurate information for the PSAPs in our E-911 system, which would result in misrouted 911 calls. PSAPs have no way of knowing who all of these companies are in order to verify that their information is correct, and the companies have not initiated contact with the PSAPs to verify

information. There is a need for the creation of a single national PSAP database which the PSAPs could provide information to, and telecommunications companies could access for the purposes of routing 911 calls. It would be appropriate to establish a timeline for the implementation of enhanced 911 service for satellite carriers. The same accuracy standards established for wireless carriers should be imposed on satellite carriers. The standards set for wireless carriers are already having an impact on PSAPs, who must attempt to determine where the caller is and dispatch emergency responders to broad areas rather than specific addresses, and on emergency responders who must search the area for the emergency. Setting lower accuracy standards for satellite carriers would have an even greater impact on PSAPs and emergency response agencies. Automatic Number Information (ANI) and Automatic Location Information (ALI) should both be required simultaneously, since PSAPs need both pieces of information to effectively respond to 911 calls. In order to minimize the impact to the PSAPs, satellite carriers should be required to interface to existing enhanced 911 systems at the same interface points required of the wireless carriers, at the enhanced 911 selective router and at the ALI database. We disagree that E911 requirements should only be triggered when a licensee has achieved a certain benchmark in subscribership. As stated earlier, if satellite services are determined to be appropriate to have access to 911, they must be required to provide the necessary information along with the call to make an emergency response to the caller's location possible. The number of subscribers should not be a factor in determining E911 requirements. E911 requirements should only be applied to real-time, two-way switched voice service that is interconnected to the public switched network. PSAPs are not equipped to receive emergency requests via two-way, non-voice, data systems, and an equipment upgrade to interact with these systems would be very costly. Regarding the capability of satellite systems to recognize a multitude of emergency dial codes, we do believe that this would violate the provisions of the 911 Act. 911 is the universal

emergency number in the United States. It is the responsibility of visitors to a foreign country to familiarize themselves with the country they are visiting, including how to access emergency services. If it is determined that 911 calls from satellite phones will initially continue to be directed to private call centers, with an implementation timeline for the provision of E911 service, satellite carriers should be required to clearly label the phones and provide information to their customers on the 911-calling capabilities of the phones.

Regarding Telematics service, we believe that emergency calls from telematics units, whether initiated automatically or by pressing a button in the vehicle, should continue to be directed to private call centers and should not be routed directly to PSAPs. Washington State law currently prohibits automatic dialing devices from being programmed to dial 911. Telematics service customers should not have the expectation that an emergency transmission from their unit will directly reach a PSAP. Telematics service providers already have established private call centers. Information has been provided to these call centers on how to appropriately transfer emergency calls to PSAPs. Many telematics customers have either jointly packaged mobile voice service or a wireless phone, so they could choose to call 911 rather than activate the emergency button in their vehicle if they wanted to reach a PSAP directly. One problem with sending telematics or automatic collision notification calls directly to PSAPs is that the PSAPs do not have the capability of calling the telematics wireless device back if the call is disconnected or they need additional information. The wireless devices in telematics units are blocked from receiving any incoming calls except for calls from the private call center. In addition, PSAPs are concerned about receiving high numbers of non-emergency or falsely activated emergency button or automatic collision notification calls. King County PSAPs are already dealing with the problem of 30% of wireless 911 calls being accidental dials. They do

not have the staff resources to also have to deal with inappropriate telematics calls. The telematics service providers sell their service to their subscribers, and they should be the ones to provide that service, not the PSAPs. In addition, they should be required to clearly label their product and inform their customers that emergency calls will be answered by their private call centers, not PSAPs.

Multi-Line Telephone Systems of all types should be required to interface to enhanced 911 systems so that the call-back telephone number and the location of the phone making the 911 call is provided to the PSAPs. Customers served by these telephone systems clearly have an expectation that they have access to full enhanced 911 services. Washington State law currently requires telephone systems that serve residential units, public schools K – 12, and multiple-unaffiliated business served by the same system to interface to enhanced 911 systems. The law does not address other businesses or schools, or other entities. It is in the best interest of the public for a uniform, federal standard that requires all multi-line telephone systems to interface enhanced 911 systems to be established. The technology and services have been developed to effectively accomplish this interface, and all citizens served by these types of telephone systems should have access to full enhanced 911 service.

Regarding Resold Cellular and PCS service, it has been our experience that the facilities-based licensee provides enhanced 911 service capabilities to all phones served by their networks, including resold service. This appears to be appropriate. Enhanced 911 service is provided at the network level, and it does not seem feasible for resellers to be required to provide this capability. The facilities-based licensee should have the right to select the technology used to provide enhanced 911 service, and any reseller who chooses to purchase airtime from that carrier

should be required to offer enhanced 911 service to their subscribers that is compatible with the carrier's chosen technology. Similarly, with pre-paid calling, the facilities-based licensees should have the responsibility of implementing enhanced 911 service for their network, and pre-paid calling providers should be required to offer enhanced 911 service that is compatible with the carrier's technology.

If disposable wireless phones have the capability of calling 911, they must be required to provide the call-back telephone number and the location of the phone to the PSAPs. The phones must also be capable of receiving incoming calls from PSAPs. If disposable wireless phones do not have the capability of calling 911, they must be clearly labeled as such. Disposable phones with no subscription to service should not have the ability to call 911, and this should be clearly labeled on the phone. Phones with no service cannot provide call-back telephone number and location to the PSAPs, nor do they help to pay for enhanced 911 service through paying 911 taxes on their phone bills. These phones should be prohibited from calling 911 unless they have the capability of providing the information to the PSAPs that is necessary in order for the PSAPs to provide emergency service to the caller.

Users of Automated Maritime Telecommunications Systems probably do not have an expectation that they can access 911 from these devices. However, if the land-based portion of this system provides the capability of dialing 911, then that portion of the system must meet the enhanced 911 requirements of providing ANI and ALI.

Emerging and future telecommunications services should be evaluated based on the FCC's criteria established in the E911 First Report and Order. Any technologies deemed to be

appropriate to have access to 911 must be required to meet the enhanced 911 requirements of providing ANI and ALI. The devices must be capable of receiving an incoming call-back from a PSAP. Voice is a critical component of communications between 911 callers and PSAPs, and allows the PSAPs to quickly determine the nature of the emergency and what type of emergency response is needed. Data-only devices should not be allowed to access 911. An exception to this would be the allowance of data-only devices as a communications tool for individuals with speech and hearing disabilities to access 911. Although PSAPs are not currently capable of communicating with data-only devices, the development of this capability for communicating with those with speech and hearing disabilities should be encouraged. TTYs are becoming an obsolete technology, and the deaf and hard of hearing organizations report that they are only used for access to 911. Other communications tools, such as personal computers using the internet or instant messaging, and Personal Data Assistants, are now routinely used for communications. It would allow for more effective communications between this segment of the population and PSAPs if they could use these tools to communicate with the PSAPs. For people who can communicate via voice, voice remains the most efficient means of communications in an emergency situation, and the use of data-only devices for contacting PSAPs by the speaking and hearing population should not be allowed.

Thank you for your continued attention and dedication to ensuring that enhanced 911 service is available to the public, regardless of the telecommunications tool used to make the 911 call.

Respectfully submitted,

KING COUNTY E911 PROGRAM

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