

Please accept this comment on behalf on the Michigan Emergency Telephone Service Committee (ETSC). The Michigan ETSC was established under Michigan's Public Act 79 of 1999. It consists of 21 organizations serving both the public and private sector, which work together to promote the successful development, implementation, and operation of 9-1-1 systems across the state of Michigan.

As the state committee tasked with facilitating Michigan 9-1-1 we are submitting this comment as part the requested input during the FCC's proposed rule-making period for the implementation of Voice over Internet Protocol (VoIP) FCC Order 05-116. The Michigan ETSC respectfully requests that serious consideration be given to the development of a centralized system for mandatory registration/qualification of VoIP providers.

A registration/qualification system would serve to ensure that only authorized providers access the 9-1-1 system. It would also provide PSAPs with access to needed information, while protecting information that is proprietary to VoIP providers. Because it would provide a base information infrastructure, a centralized registration/qualification system could be used in the future migration to an IP-based 9-1-1 network.

We would propose this registration/qualification system must include the provider's essential contact information such as the provider's 24 X 7 network operation center (NOC) and corporate administrative contact information. The registration/qualification system should also require VoIP providers to identify their connectivity format to the publicly switched 9-1-1 system and method or provider of their 9-1-1 database maintenance system.

The ETSC has the highest degree of respect for the challenges facing the FCC in the approaching growth of VoIP. Its future effect on communications may well be tremendous. The FCC's recognition and support of 9-1-1 accessed through VoIP will be essential to the continued vitality of 9-1-1's critical service.