Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
IP-Enabled Services	)	WC Docket No. 04-36
	)	
E911 Requirements for IP-Enabled Service Providers	)	WC Docket No. 05-196
	)	
	)	

JOINT COMMENTS BY THE AMERICAN ASSOCIATION OF POISON CONTROL CENTERS AND THE NATIONAL EMERGENCY NUMBER ASSOCIATION

The National Emergency Number Association[1] ("NENA") and The American Association of Poison Control Centers[2] ("AAPCC"), hereby respond to the Notice of Proposed Rulemaking ("NPRM") in the above proceeding[3]. NENA and AAPCC jointly offer comments regarding certain points raised in the NPRM and what may be needed for other entities, beyond traditional 9-1-1, which may receive calls from the public of an emergency nature and/or require interaction with local/regional 9-1-1 entities. Two key questions asked in the NPRM are being addressed in this joint filing including "whether the Commission should expand the scope and requirements of this Order" and "what the Commission can do to facilitate the development of techniques for automatically identifying the geographic location of users of this type of VoIP service."

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[1] NENA's mission is to foster the technological advancement, availability, and implementation of a universal emergency telephone number system. In carrying out its mission, NENA promotes research, planning, training and education. The protection of human life, the preservation of property and the maintenance of general community security are among NENA's objectives. With more than 7,000 members in 46 chapters across the U.S. and Canada, NENA serves as "The Voice of 9-1-1" through policy advocacy, the establishment of national standards, certification and testing programs, and a wide variety of educational offerings. More information can be obtained at http://www.nena.org.

[2] AAPCC's mission is to promote excellence in poison prevention, education, research and treatment and to support our member centers in their public health mission to provide quality poison control center services. With more than 1,200 members in 69 poison centers covering all of the United States and Canada, the AAPCC serves as the national voice for poison center services. The AAPCC serves its members through production of educational materials, creation of national standards, certification and testing programs, and as an advocate at the national level with both government and non-governmental organizations.

[3] 70 Federal Register 37307, June 29, 2005.

JOINT COMMENTS

VoIP providers utilizing broadband access provisioned by other entities (such as DSL and cable) often do not know the location of their customers when theses customers are using the service for outbound calling. If a call is made to a national 800-like number with a tree structure to route calls to the appropriate recipient based on area code and exchange, such as that used to access local/regional/state poison control centers, this lack of location data, in conjunction with the existing technical methods for managing an 800-like call entering the PSTN from a gateway or other VoIP provider connection, can result in calls being misrouted and delivered to a poison control center in the wrong state, often remote geographically from the location of the caller. Thus, poison control center calls from consumers across several states may all be routed to a single state's poison control center which may not even be closely located to that region of the country. For example, if the VoIP provider's connection is in New Jersey but the VoIP users are located in California and Oregon, the calls may be routed to the NJ poison control center rather than to the appropriate California or Oregon center.

The current poison center system is similar to local 9-1-1 dispatch centers but on a larger geographic scale. Most regional poison centers manage calls from an entire state or parts of a state. Every day there are over 6,500 calls placed to poison control centers throughout the United States. The calls originate from worried mothers, despondent spouses, misguided adolescents, emergency department physicians, first responders, law enforcement and countless others. Poison centers assist callers by rapidly assessing health risk, creating a treatment plan, and directing patients to appropriate care based, in part, on their knowledge of local resources.

Proper call routing is a fundamental part of the poison control system. Routing of calls to the appropriate regional poison center allows for rapid response and appropriate treatment advice from the center most familiar with the region. To be effective, a regional poison center must have intimate knowledge of local hospital capabilities, regional antidote inventories, cultural needs of the population, and an established working relationship with the healthcare providers in the region. By streamlining the care of victims of potentially toxic exposures, the regional poison centers in the United States produce more than $200 million dollars in savings of healthcare dollars annually. Additionally, poison centers have developed and maintained the only real-time geographically based nationwide database (including patient location, symptoms, substances involved and real-time follow-up) that can be monitored for emerging threats. Access to this database is shared with the federal Centers for Disease Control and Prevention and the Department of Homeland Security.

Just as Congress has passed 9-1-1 laws, Congress also passed the Poison Control Center Enhancement and Awareness Act [Public Law 106-174-Feb. 25, 2000]. That Act called for the establishment of a nationwide toll-free phone number to be used to access the 61 poison centers located in the U.S. A nationwide toll-free number was established by Congress because poison centers have been recognized as a valuable national resource that provides life-saving and cost effective public health services. Without proper routing of calls, the life-saving services established by this act may be lost to an increasing percentage of the population.

There are other entities/services which also have difficulty with incorrect routing of calls and have calls blocked by some VoIP providers. These include 2-1-1, 3-1-1, 5-1-1, 7-1-1 and 8-1-1, all of which are dependent on knowing the caller's general location to route to the correct answering entity. All of these services can receive calls of an emergency nature needing transfer

of the call and/or the information to the correct 9-1-1 entity/PSAP (public safety answering point). Having these numbers blocked to access by VoIP customers because of the inability to properly route is unacceptable. Examples of these services include (8-1-1) a service that allows citizens to alert authorities that they will be digging so that utilities can be properly marked. They also include VoIP users trying to access telecommunications relay service (7-1-1), highway conditions and highway events (5-1-1) sometimes of an emergency nature, local law enforcement/government non-emergency access (3-1-1) and various social services (2-1-1), including United Way and referral agencies. Other 800-like numbers include national suicide hot lines, which may route to local/regional centers, dependent on caller location (which again can be unknown for a VoIP caller).

In all the aforementioned services, there is a 9-1-1 interaction, with the various entities transferring or relaying calls to 9-1-1 centers or other local/regional call centers such as regional poison control centers or 9-1-1 centers transferring or relaying calls to the various types of call service centers. Routing of the initial call to the appropriate local/regional entity is an important component for ensuring that information is available for the correct transfer/relay of calls to other entities, especially in emergency situations.

Complying with the FCC mandate, VoIP providers and their vendors are implementing solutions for E9-1-1 provisioning. In general, these solutions include components of the traditional 9-1-1 network which has not been used to assist in the correct routing of the various numbers mentioned above. In the past, routing for numbers other than 9-1-1 has been accomplished separate from the 9-1-1 network, often based on the geographic nature of the phone number (such as a rate center with which an NPA-NXX is associated).

Conclusion

For reasons stated above, with VoIP's nomadic nature and customer use of non-native numbers (VoIP customers that choose numbers not associated with the area in which they reside), traditional routing methods do not work. As national call routing and location-determination processes (including regulations) are created, it is important for the FCC to consider that a call routing solution for future E9-1-1 should also be considered as a possible routing solution for the various numbers and entities listed in these comments.

Respectfully submitted,

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