

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

**In the Matter of:** )  
 )  
**Framework For Next Generation 911 Deployment** ) **PS Docket No. 10-255**  
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**COMMENTS OF THE 9-1-1 INDUSTRY ALLIANCE**

The 911 Industry Alliance (9IA)<sup>1</sup> submits the following comments in response to the Federal Communications Commission’s (Commission) Notice of Inquiry (NOI) adopted and released December 21, 2010 in the above-captioned proceeding which seeks comment on how “... Next Generation 911 (NG911) can enable the public to obtain emergency assistance by means of advanced communications technologies beyond traditional voice-centric devices.”<sup>2</sup>

The Commission recognizes that the introduction of new technologies and devices “has created the potential for development of *and transition to* NG911,”<sup>3</sup> that NG911 will require a transition from the current PSTN-based architecture of legacy 911 to an IP-based architecture<sup>4</sup> whereby these infrastructures will operate side-by-side for some period of time; and the Commission seeks to understand “how the gap between the capabilities of modern networks and devices and today’s 911 system can be bridged.”<sup>5</sup>

Although there is some urgency to evolving emergency communications in the U.S., 9IA believes it is important that the transition to NG911 be carefully accomplished given the mission critical nature of our nation’s 911 system. We also believe that NG911

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<sup>1</sup> The 9-1-1 Industry Alliance was established in December 2005 by a group of prominent industry leaders to represent the emergency communications industry in the development of emergency technology infrastructure and policy for the good of public safety and the public it serves. The mission of the Alliance is to support efforts to ensure adequate funding for 9-1-1; to conduct scientifically credible and objective research to support innovation and implementation in the 911 industry for the benefit of the public; to bring together industry leaders in order to maximize the value of research and development investment; to create a constructive environment to conduct programs to further the science and technology of emergency communications for the proactive development of technologies and operational strategies to advance and improve 911 service; to represent the industry before the public and governmental bodies.  
<http://www.911alliance.org>.

<sup>2</sup> NOI, p. 2.

<sup>3</sup> NOI, p. 2.

<sup>4</sup> NOI, p. 9.

<sup>5</sup> NOI, p. 2.

ultimately must be standardized in order to promote adoption and efficiencies and to avoid confusion and waste throughout the implementation process. 9IA recognizes that a single, comprehensive and open (non-proprietary) NG911 interface standard is essential to achieve fully interoperable NG911 communications and to realize the full potential and benefits associated with non-traditional data types.

Unfortunately, today there is not unanimous industry support for any particular standard for NG911, and such industry support is critical if it is to ultimately be successful. Any NG911 standard which does not have support from the 911 industry community will find difficulty reaching acceptance in the marketplace and unfortunately delay the significant promise of NG911 which we all seek. 9IA also encourages the Commission to accelerate the completion of a standards-based approach to NG911 and to resist acceptance of interim, transitional and/or proprietary specifications.

The Commission does reference various proposals being developed for NG911 standards, including one from the National Emergency Number Association (NENA), i.e., “NENA Functional and Interface Standards for Next Generation 9-1-1 Version 1.0(i3).”<sup>6</sup> 9IA believes that the i3 standard proposal has promise but recognizes that the standard in its current form is incomplete and cautions against basing findings or rulings on any proposal at this stage.

The transition to NG911 signals the most sweeping changes the 9-1-1 industry has ever seen. They will dwarf the work that was done to incorporate wireless 911. In order to achieve the vision of NG911 that includes new data types such as text, pictures and video capability, significant effort and consideration needs to be given to transitional planning as well as the cost implications that will befall the multiple stakeholders of the public safety community. Finally, there are significant cyber-security issues that unfortunately must become a component of NG911 given the planned usage of open architectures, networks and systems.

In our view, NG911 must be comprehensively addressed and standardized. To not do so will be gambling with the public’s safety and security.

## **CONCLUSION**

The 9-1-1 Industry Alliance thanks the Commission for its leadership in matters related to public safety, specifically regarding this critical topic at such an important time.

Through thoughtful planning and solid business practices, we believe that the Commission can achieve its goals. 9IA asks the Commission to: (a) utilize 911 industry subject matters experts, including 9IA and its members, in conjunction with an appropriate and respected standards body to create an industry-accepted standard; and (b) assure planning for and deployment of NG911 is done in a careful manner to ensure

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<sup>6</sup> NOI, fn 54.

effective implementation with competitive and technological neutrality to maximize innovation for the benefit of public safety users.

Respectfully Submitted,

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Dated: February 28, 2011