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 PUBLIC SAFETY COMMUNICATIONS OFFICE
OF THE CALIFORNIA TECHNOLOGY AGENCY

Karen Wong
Deputy Director
Public Safety Communications Office
California Technology Agency
601 Sequoia Pacific Boulevard
Sacramento, CA 95811-0231601

Ryan Dulin
Chief
California 9-1-1 Emergency Communications Division
California Technology Agency
601 Sequoia Pacific Boulevard
Sacramento, CA 95811-0231

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The Public Safety Communications Office (PSCO) of the California Technology Agency hereby files comments in the above -referenced docket on the framework for Next Generation 9-1-1 (NG9-1-1) Development.

In 2010 the California 9-1-1 system handled 23.8 million calls. The current California 9-1-1 system is built on a legacy telephony-based platform that is unable to support new demands and capabilities, as our residents increasingly use advanced Internet Protocol (IP) –based devices and applications that enhance how the public communications and sends/receives information. Widespread adoption of rapidly advancing technologies like texting, video, Voice over Internet Protocol (VoIP), and the increase in high speed broadband access to our state has raised the expectations of 9-1-1 service for our residents. The Public Safety Communications Office of the California Technology Agency has recognized that 9-1-1 improvements are necessary to support new expectations and new requirements.

On July 30, 2010, the California's Technology Agency (then the Office of the Chief Information Officer) published a California 9-1-1 Strategic Plan to ensure our 9-1-1 system meets new challenges. The PSCO was determined to be the state office to drive leadership to plan, develop and implement our

NG9-1-1 environment. It will establish a NG9-1-1 governance structure including the Advisory Board, County Coordinators, PSAP staff, professional organizations and vendors. PSCO will ensure it has sufficient knowledgeable staff to transition and support the change to NG9-1-1 in California. It will develop new tools to enhance staff effectiveness for planning, and problem solution analysis. [1]

In the Strategic Plan, California recognized a wide range of potential communications possibilities with NG9-1-1: landline voice, local mobile voice, cellular, stationary and mobile VOIP, SMS and MMS texting, pictures, stationary and mobile video, email, instant messaging, telematics and others.[2] NG9-1-1 suggests databases that include customer information for these communications services, plus information from other potential databases such as medical records, criminal records, incident records and building plans. The selection of what elements to include impacts technical design, complexity of project management, costs, administration and management of the services, legal changes, public expectations/education.

In looking at the criteria for including or excluding various communications technologies into California's NG9-1-1 solution, PSCO will establish criteria that may include: (1) prevalence or popularity of the modality for communication, as well as its purpose; (2) whether or not the modality is capable of providing real-time communication between the requestor and the PSAP; (3) the degree that certain disadvantaged parties are reliant upon the communications modality (e.g. deaf, speech disabled, blind, etc.); and (4) the extent that the modality might be considered by the public or others to be useful or normal form of communication to request emergency help.[3]

The PSCO will also determine a process to identify the appropriate data to include in the NG9-1-1 solution. The PSCO and the 9-1-1 community will assess standards for data format, accuracy, security, delivery and other parameters. This will be an ongoing process as new technologies and new data

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[1] http://www.cta.ca.gov/PSCO/911/pdf/911_Strategic_Plan.pdf ("Strategic Plan").
[2] California 9-1-1 Strategic Plan at 13-14.
[3] California 9-1-1 Strategic Plan at 15.

sources evolve. Using the criteria, we will assess which communications technologies should be included in our NG9-1-1 solution.[4]

PSCO will then define the NG9-1-1 architecture. Key NG9-1-1 elements will include: (1) IP based and open standards technology; (2) security requirements; (3) deliver requests to PSAPs over IP network without requiring specialized hardware and software at the PSAP; (4) all 9-1-1 communication modality vendors to provide all information necessary to identify and route the request; (5) establish a statewide knowledge system to route requests based on business rules; (6) support complete flexibility of PSAP jurisdictions and operations; (7) robust services and delivery mechanisms, including leveraging existing or planned state infrastructure as appropriate; (8) Ensure the NG9-1-1 system is publicly owned and non-proprietary.[5]

In the Strategic Plan, it was also recognized that the funding mechanism must be modernized. In California, current 9-1-1 funding comes from user fees collected by landline and wireless telephone service providers (a percentage of costs of consumers' intrastate calls). The 9-1-1 fees are remitted to the State through the Board of Equalization, into the State Emergency Telephone Number Account (SETNA). By law, SETNA funds may only be used for certain 9-1-1 program expenses: reimburse telephone companies for their customer databases, routing systems and circuits and PSAP 9-1-1 call taking equipment. Other costs include State's 9-1-1 Office, BOE, a portion of CHP call taker costs, and reimbursements for County Coordinators, education, training and travel. The funding mechanism and expenditure rules will need to change if non-regulated (non-incumbent local exchange telephone companies) communications providers provide NG9-1-1 solutions.[6]

The Strategic Plan also created an open marketplace for NG9-1-1 solutions, by promoting market outreach and enrichment, procuring open source NG9-1-1 systems and services, preserving open

[4] California 9-1-1 Strategic Plan at 15.
[5] California 9-1-1 Strategic Plan at 16-18.
[6] California 9-1-1 Strategic Plan at 18-19.

access to the market, and publishing/distributing shared solutions.[7] County Coordinators were empowered to help support the NG9-1-1 transition, with standardized training programs and finding the best way to use their services.[8] The State 9-1-1 Advisory Board was recognized as having a key role in advising on NG9-1-1 changes from a policy point of view, with education, increased sharing of information and leadership.[9]

The Strategic Plan also recognized the need for public education on when best to use 9-1-1. PSCO will determine the percentages of call types among California 9-1-1 calls, study the costs and benefits of a public education campaign, conduct focused public education as necessary, and establish standard messages for PSAPs re non-emergency phone numbers to include on their websites.[10] Finally, the PSCO will coordinate the ongoing monitoring and performance of the new NG9-1-1 system, by defining key performance indicators and business rules, creating a NG9-1-1 performance dashboard, creating a NG9-1-1 Community Portal, and communication up to state management and elected officials as well as to the public on how NG9-1-1 system is operating.[11]

The Strategic Plan was followed by the release of a Proposed California NG9-1-1 Roadmap in December 2010 that outlines steps necessary to design and build a robust and comprehensive NG9-1-1 system.[12] In February and March 2011, PSCO is holding six public hearings in Redding, Sacramento, San Diego, Fresno, San Francisco, and Ontario to hear from the public on specific questions relating to an anticipated transition to Next Generation 9-1-1 system.[13] Thus, we applaud the FCC's forward-looking action to begin an inquiry on important issues relating to NG9-1-1.

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[7] California 9-1-1 Strategic Plan at 20-21.
[8] California 9-1-1 Strategic Plan at 21-22.
[9] California 9-1-1 Strategic Plan at 22-23.
[10] California 9-1-1 Strategic Plan at 24-25.
[11] California 9-1-1 Strategic Plan at 25-26.
[12] http://www.cio.ca.gov/Government/Publications/Proposed_State_of_CA_NG9_1-1_Roadmap.pdf
[13] http://www.cio.ca.gov/Public/pdf/NG_9_1_1_Public_Meeting_Notice_and_Questions.pdf

At the outset, we agree that a uniform national approach to these new technologies is important and desired. We acknowledge that today's 9-1-1 system relies on increasingly antiquated analog or digital circuit-switched facilities. We agree that as a result, it is not capable of supporting certain functionalities made possible by a transition to broadband IP-based communication technologies. We believe some of these functionalities could be very beneficial to a more modern, robust IP-based NG 9-1-1 system. A nationwide approach will help ensure that precious public dollars we expend to upgrade our systems will be in accordance with national standards that are generally accepted by PSAPs in our state. We are pleased that public safety organizations and industry standard organizations have reached consensus on NG9-1-1 technical architecture so a uniform national approach is possible.

We commend the FCC's approach on the National Broadband Plan which contained positive recommendations relating to NG9-1-1.[14] We agree that the time has come for a focused FCC proceeding to form proposals and drive consensus on how to achieve an improved 9-1-1 system that integrates the communications platforms that the public use and upon which they might expect to request emergency services. Quite simply, our public safety officers should have the same tools that the public has at their disposal. A public member may take out a Smartphone, take a photo of a disaster scene and send it immediately via wireless broadband to a family member. Law enforcement, fire, or Emergency Medical personnel do not have the same handset or wireless broadband system to do the same to get a photo of the scene to central command.

We agree there are many benefits to broadband enabled, IP-based 9-1-1 network in terms of flexibility, resilience, functionality, innovation and competitive opportunities. Currently, the CA 9-1-1

[14] See Chapter 16 of the FCC's National Broadband Plan, at pp. 313-329.

Office has a Routing on Empirical Data (RED) and an Emergency Calling Tracking System (ECaTS) projects to establish a baseline for NG9-1-1.[15]

We further advocate that the NG9-1-1 transition should be done on a timely basis, and that as a result, some federal matching grants might be in order to help bring the transition occur more quickly in all areas of the nation. We urge the FCC to bring recommendations to Congress to ensure adequate funding.

We note that NG9-1-1 cannot operate in areas where broadband communications are unavailable. Thus in the last five years, our state has put a high priority on providing incentives for upgrades for areas that are unserved or underserved in terms of broadband systems.[16] One reason for our actions is to ensure there are no Digital Divides between or urban versus rural/remote/tribal areas. We commend the FCC's focus on bringing broadband service to community anchor institutions, the most important of which are public safety, schools, libraries, health care facilities, and municipalities' public buildings (i.e. court houses, jails, city hall, first responders, etc.)

Answers to Areas Where Comment Requested:

Potential Media Types

Regarding potential media types in an NG9-1-1 environment, we think the list contained in paragraphs 33-38 is a good list to consider whether they should be included in NG9-1-1 systems. We see

[15] In California, two American Recovery and Reinvestment Act (ARRA) Broadband Technology Opportunities Program (BTOP) projects will be bringing broadband data systems to public safety entities in two of our most populous regions on our state. One ARRA grant is for our Los Angeles Regional Interoperability Communications system and the other ARRA grant is for the BayWEB system in the Greater Bay Area. In both systems, we expect public safety agencies to be exchanging video, images and data to enhance the public safety agencies' responses to the 9-1-1 system. Examples of how we expect to use data in our NG911 systems includes sending live video and building plans to an officers responding to a robbery or hostage scene, sending fingerprint images to the central registry for identification of persons who are in custody in the field, using stationary traffic cameras to collect real time data, and sending photos of disaster or terrorism scenes to first responders for enhanced situational awareness.

[16] An example of the state's broadband infrastructure efforts includes the California Advanced Services Fund program of the California PUC, which established a $100 million grant program for two years to fill in unserved and underserved areas. By state statute, this program has been extended for five more years with $100 million more in infrastructure funds for that term.

positive benefit in message-based text, real-time text (particularly important to the disability community), still images/photos in common file formats such as .jpg, real-time video, telemetry data and auxiliary medical and other personal data (the latter so long as prior consent is obtained for the PSAP to forward it to EMS personnel or other first responders).

Primary v. Secondary Usage

We agree with the assessment contained in paragraph 39 regarding what is primary vs. secondary media. We believe email may be a possible way to connect directly to a PSAP but we express concerns about fraudulent emails, given it is not difficult for hackers to obtain fake email boxes. At this time, we do not believe a social network status page should be a primary means to contact a PSAP, because PSAPs and the social networking provider lack personnel to monitor of millions of pages or "tweets" at all times. If a PSAP voluntarily opts to have a Twitter or other social network account, it may decide to support such an approach.

Regarding secondary media, we believe that PSAPs should be able to receive photos, live video and sensor data. We believe this may greatly enhance response ability and provide critical supplemental information from a 9-1-1 caller or the caller's device. In a major disaster (e.g. wildfire, explosion, earthquake or flood) or other emergency (gun wielding bank robber or major traffic pile up in fog), this kind of data may be very useful to first responders to enhance situational awareness before arrival at the scene.

Regarding sensitive personal data that is secondary media, consumer privacy protection of such data by the PSAP and others must be addressed and ensured. California has strong privacy protections for our residents under our state Constitution. Thus, privacy concerns must be considered in any policies, laws or regulations that may be adopted.

SMS for Emergency Communications

We agree with the statement in the Notice that some consumers do think they should be able to text 9-1-1 sometime in the near future. Data from CTIA shows that 1.73.2 billion SMS text messages are being sent each month, mostly from mobile phones.[17] Further, we note that the disability community is particularly requesting this support for persons with deaf or speech impairments who rely on text paging for all communications, particularly when out in public. We support the addition of receipt of SMS messages as an early move beyond a voice only emergency calling framework. Regarding trials, we direct the FCC's attention to a successful "low tech" program begun in 2003 of the City of Sacramento's Police Department, responding to 9-1-1 text messages from the disabled community.[18]

Further, we do share the concern that as an asynchronous messaging service, the sender does not know whether and when the message has reached its destination. Consumer education about this aspect would have to be undertaken should SMS service be offered by a 9-1-1 provider and liability should be limited should the SMS provider fail to deliver the text in a timely manner.

NG 911 Applications for Persons with Disabilities and Special Needs

We applaud the focus in the Notice to find achievable and technically feasible ways for deaf and those with hearing and speech impairments to access 9-1-1 services. Whatever is undertaken in the NG9-1-1 system, consideration should be given as to what is the most effective and efficient way to enable access to 9-1-1 for these individuals with disabilities. Among the most promising methods appears to be texting, real time texting, and video for sign language. We suggest that the FCC focus on the most reliable interoperable communications that is possible to serve this community. If there are shortcomings with any method, consumer education should be undertaken to make those shortcomings known to the user.

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[17] http://www.ctia.org/consumer_info/service/index.cfm/AID/10323 (June 2010 figures)

[18] At a recent Department of Justice hearing here in San Francisco, Vera Hill, a dispatcher with the Sacramento Police Department, testified about the Department's two-way pager service, staffed 24 hours a day by a Sacramento PD dispatcher. Upon receiving a text for help, the dispatcher immediately enters a call for service, and if necessary, contacts an allied agency or other jurisdiction for appropriate assistance.

We further applaud the Commission's questions about ensuring non English speakers access to emergency services. In our state, we have many non English speaking residents depending on the community and currently translate 9-1-1 calls into approximately 91 different languages. We suggest some recommendations for providers to find out periodically what non English languages are commonly spoken in their jurisdictions and to make sure access to the 9-1-1 system is provided for those languages.

NG911 Network Architecture

Transport Mechanisms in an NG911 Environment

Regarding paragraph 49, consideration for the transport mechanism should be given to a system that is built on a national, universal technical standard that does not employ proprietary architecture. The transport should be private, isolated, and secure. We have concerns about the cost factor of PSAPs supporting a large number of IP –based NG9-1-1 architectures.

NG911 Participants

Regarding paragraph 51, any participant shall provision location information in order to deliver a 9-1-1 call.

Regarding paragraph 52, ideally, a national standard should be developed and adopted that would provide regulations for devices that connect to 9-1-1. Not every electronic device that has communications capabilities should connect to 9-1-1. We believe that at present, these devices should provide emergency calling services: wireline and wireless phones, VOIP phones, texting devices, in-car systems, small factor computers (e.g. netbook, tablet computer devices). At present, we do not think consumers have an expectation that gaming consoles or portable music players will connect to the 9-1-1- system. In the future, this list could evolve.

Devices that meet the regulations should be labeled to identify it as ”9-1-1 capable” to consumers. Consumer education should be undertaken to educate consumers on new 9-1-1 connectivity opportunities, and to educate them on non-emergency calling numbers in the local area.

Interoperability and Standards

Regarding paragraph 54, we recommend a national standard be developed for media encoding. We see the sending of photo images to be a critical piece of data that is of great use for public safety users. Thus, we want to ensure that photo images pass through the systems with ease and in a way that best increases their chances to be recognized as an image and a good quality image received. Requirements for bandwidth, quality of service, format and security must be considered when developing a national standard.

Regarding paragraph 55, global standards must be developed for digital information that is to be accepted into NG9-1-1 networks and transported to emergency responders. Those standards must be coordinated on a world-wide basis for maximum universal acceptance and use. There are already standards bodies that are involved in this type of activity (IETF, ATIS, for example). The expertise of these entities should be leveraged for the public good.

There is also a need to enforce the use of whatever standards are eventually accepted and codified so that network and public safety equipment providers are required to comply with them. We recommend a certification process by approved certification originations to ensure the highest technical standards are attained and to ensure that 9-1-1 integrity is maintained.

PSAP Functions in an NG911 Environment

Regarding paragraph 56, current technology supports virtualization of the PSAP, which is a very positive development and may lead to PSAP consolidation with attendant cost savings. Further work

needs to continue to improve and enhance this capability. Local jurisdictions should be allowed to make their own agreements through either Joint Powers Agreements (JPA's) and/or Memorandums of Understandings (MOU's) regarding the operational aspects of PSAP virtualization in an NG9-1-1 environment. Regulatory and legal barriers should be removed to ensure that virtual PSAPs are allowed. Further legal and regulatory barriers should be removed to allow the marketplace to effectively develop and provide useful equipment that operates consistent with industry standards. We favor competition and innovation to drive the market that will support virtual PSAP operation and other advanced capabilities that support emergency networks and equipment.

Regarding paragraph 57, the role of national agencies should be to foster national standards and certifications, and to ensure interoperability between local and regional jurisdictions. There are national organizations comprised of public safety professionals as well as professional engineering groups that can and should assist in the development of standards. The FCC should allow for standards development in the free marketplace, codify them for national use through a recognized standards body and enforce them.

Other Specialized NG911 Applications

Social Media for Emergency Communications

Regarding paragraph 59, the California experience is that consumers do not at present use social media as a primary way to report an emergency or contact public safety during an emergency. They have been educated to use a wireline or wireless telephone to contact 9-1-1. At present, we do not see a cost effective way to monitor the public's voluminous social network postings to respond in a timely

manner to calls for help via a Facebook, My Space, Twitter posting. However, we have observed the usefulness of social media to adding some accurate "on the scene" information for first responders.

For example, we have seen the usefulness of Facebook sites and Twitter subscriptions operated by official public safety entities are useful in pushing important information out to the public in major emergencies, such as wild fires, earthquakes, floods, gas explosions. For example, information about emergency escape routes, shelters, animal shelters, closed roads, etc. can be pushed to the public easily through these social networking sites operated by public safety or other official authorities, in addition to the more traditional methods (press event, press release, media interview to broadcast and press outlets). Social media outlets are very rapid and inexpensive to operate. As a result, we strongly encourage public safety entities to become fluent in new social networking methodologies and to use them as appropriate to communication outward to the public.

As a result of the rapid evolution and adoption of social media communications, we recommend that the Commission continue to monitor these developments and consider how these social media tools may be integrated into our NG9-1-1 systems.

N11 Numbers and Other Services for Emergency Communications

Regarding paragraph 60, we do favor looking at whether costs and service can be improved for N11 location-based information and assistance services using a common technology platform for referrals. Coordination and integration between some N11 services and NG9-1-1 may be very useful. For example, in California, we have had a successful deployment of 2-1-1 community information and referral services in 26 counties serving 90% of our state's population, with expansion expected to the

rest of our counties. Local 2-1-1 call centers fielded over 1.8 million calls in 2009 statewide, and helped residents connected to the resources they were looking for.[19]

Auxiliary Data

Regarding paragraph 61, we suggest that provision of a caller's medical history must have prior consent and be transmitted in a secure method to the first responder. Regarding transmission of building floor plans and hazmat materials, this could be is very important data to be transmitted to law enforcement and fire authorities when responding to emergency situations, such as a fire, a crime or hazmat situation in progress. There should be standards to ensure that the party who transmits the data does so in a format that is compatible to the NG9-1-1, and that the information is as accurate as possible. Ideally, standard should be set so that PSAPs obtain access to such data as a group to lower the costs of access to data. Public disclosure should depend on the type of data. In general, publicly available information should not be protected, but confidential and non-public data should not be disclosed.

Issued Related to NG911 Implementation and Timeline

We agree that there are many operational, technical and other challenges associated with the NG9-1-1 transition. In California, we took our first step by putting out a Strategic Plan in July 2010 that set forth our goals to transition to NG9-1-1. We then set forth a Proposed Roadmap in late 2010 to chart the milestones and time lines to achieve our goal. We are now engaged in coordinated planning

[19] http://www.211california.org/about-2-1-1/what-is-211. Particularly in major emergencies, our 2-1-1 system helps take the load off the 9-1-1 system by accepting calls for non-emergency questions, such as shelter locations, closed roads, food bank locations, utility shut off information, free/low cost health care, rent or mortgage assistance, insurance referrals, and safe and well postings. We also believe that 5-1-1 (traffic information) and 3-1-1 (non-emergency city services) might have useful interactions.

and implementation efforts by our stakeholders: state government, PSAPs, first responders, industry, communities, and others. This must be done well in advance to begin financial planning efforts.

We believe that national leadership is very critical to this effort. Without national leadership, consistent national standards will not be set or enforced. We further believe open source is critical to the effort. Cash strapped jurisdictions will be reluctant to invest in new technology platforms unless they know it is a technology that is viable for the long term. We believe a nationwide set of milestones containing a planning horizon is very critical to this effort. In some areas, there may be push back from local entities for various reasons, including budgetary, and so general policies to encourage or even mandate transition to NG9-1-1 may be required. Federal grants to assist some localities may be required.

Disparate PSAP Capabilities in an NG 911 Environment

Regarding paragraph 66, as a practical matter, any NG9-1-1 system and network deployed must be interoperable with legacy network elements and users. Provisioning of NG9-1-1 networks needs to be planned carefully to avoid user confusion. Regional coordination is also desirable. A timetable should be established with careful consideration given to the impacts on various participants.

9-1-1 Competition

Regarding paragraph 67, the Commission is correct that competition between multiple System Service Providers (SSPs) is expected, desirable and beneficial. In California, we have strong head to head competition between incumbent local exchange carriers, cable providers (holders of statewide video franchise authorities and VOIP providers), VoIP providers, commercial mobile radio service providers, and others. It is inevitable that competitive services will emerge in the 9-1-1 marketplace here. We believe that it is critical that any federal, state or local barriers to NG9-1-1 transition be removed. The

California Technology Agency is currently exploring state and local barriers and will seek to remove them. We recommend that the FCC do the same at the federal level. We believe that the Commission should provide a level playing field via for all NG9-1-1 competitors and to provide enforcement tools.

Regarding paragraph 68, as the first step, the Commission should develop regulations that make it clear that a transition to NG9-1-1 is in the national public interest. It should propose regulations to ensure that antiquated regulations are preempted and that a level playing field is set via regulation to ensure interoperable open and competitive NG9-1-1 systems. In particular, regulations favoring the incumbent local exchange carrier as to provision of 9-1-1 services should be removed or revised to allow open and fair competition.

Regarding paragraph 70, the FCC and NENA should work together with industry partners to formulate language that overcomes the legitimate NENA objections raised in this section. The goals should be based on need, service and functionality rather than technology driven.

Location Capabilities

Regarding paragraph 76, it is imperative that the accurate location of any caller who uses 9-1-1 be delivered to the PSAP quickly. This outcome must be is regardless of the technology employed by the user and irrespective of the delivery network. Thus, it is important that federal regulations require that access providers provide call location data to end systems and/or voice service providers on reasonable and non discriminatory terms using standard protocol interfaces. Some networks may not be easily able to discover, validate and convey location information. As a result, such networks should not be included in the NG9-1-1 network unless such location information can be reliably conveyed.

Network and Data Securities Concerns

Regarding paragraph 77, we agree that there are very serious issues relating to the security, integrity and reliability of NG9-1-1 networks and information. Cybersecurity and data security concerns should be at the foremost of issues addressed in development of NG9-1-1 architecture. Only authorized entities should have access to the information and should have legal obligations to protect it.

Education

Regarding paragraph 78, we agree that public information campaigns are critical to educate our residents about the changes to the 9-1-1 system necessitated by advancements in communications technologies. Similar to the Digital Television Transition effort conducted by NTIA, we suggest that the FCC create a national public information campaign (media ads, social media, and press events) to explain the changes and the need for them. Given the importance of 9-1-1 calling during emergencies, we think this type of national effort is warranted and in fact required. Further, industry groups such as NENA and APCO might play an important role in educating consumers nationally, while the states should address their unique issues, for example, in language advertising. Public education on how to use 9-1-1 and the local non-emergency phone number should be done locally and regionally, using nationally-coordinated materials that are tailored for local use so that the message distributed nationally is uniform in content and scope. Finally, we recommend special efforts of outreach to these communities: senior citizens, non English speaking, low income communities, people with disabilities, tribes, and those who live in very rural or remote areas.

Unidentified Caller Access to 911

Regarding paragraphs 79-81, we agree that unidentified caller access may increase as there are new ways to access the NG9-1-1 system in the future. However, we have serious concerns about creating authorization procedure models relating to state motor vehicle authorizations. This may discourage illegal immigrants from being able to call for 9-1-1 assistance when needed. We have similar

concerns regarding other credential models. We think it may be very challenging to formulate authentication and authorization models. We further express concerns about denying emergency calls to zero – balance consumers. Emergency calls should be free to the caller, unless there is proven abuse of the 9-1-1 system by a particular caller.

Jurisdiction, Authority and Regulatory Roles

In California, we believe that state level leadership and planning is necessary and desirable to ensure local coordination and the success of a NG9-1-1 transition. As a result, the California Technology Agency's Public Safety Communications Office has taken on this role for our state as discussed infra.

In general, we recommend that each state designate an organization that will be responsible for planning, coordination and implementation of a NG9-1-1 system, to ensure operability and interoperability between all state, local and regional ESInets. This should include inclusion of any Tribal authorities in the state also.

Due to the importance of the deployment of NG9-1-1 in our country, we think a federal NG9-1-1 framework overseen by the FCC or other national Federal entity may be advisable, to ensure timely and coordinated transitions to NG9-1-1 networks, while preserving state authority for 9-1-1 systems. The areas of oversight would ideally include establishment of national milestones, development and enforcement of standards, coordination of consumer education, coordination of implementation of different types of media and other data inputs, and establishing a level playing field for competitors in the 9-1-1 arena. Efforts should also include work with our border partners (Canada and Mexico) to deal with any NG9-1-1 issues that are cross border in nature.

Further, we do believe the FCC should confer with the federal health agencies on telehealth, mobile health and disability issues that may arise due to the NG9-1-1 transition. Closer coordination would be very helpful.

Respectfully submitted,

_/s/_____
Karen Wong

_/s/_____
Ryan Dulin