

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

In the Matter of:)

Framework for Next Generation 911)
Deployment)

PS Docket No. 10-255

REPLY COMMENTS OF CTIA—THE WIRELESS ASSOCIATION®

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EXECUTIVE SUMMARY

CTIA-The Wireless Association® and its member companies appreciate this opportunity to provide additional perspective on the important issues raised in the Notice of Inquiry and discussed in the initial comments. The record compiled in the first round of this proceeding clearly demonstrates the effectiveness of the ongoing, collaborative NG911 development process. While the Commission should not impede these processes, the initial comments identify several areas of common concern that could benefit from the Commission's guidance. As discussed below, the Commission should consider opportunities to collaborate with all interested parties and regulatory bodies to reduce uncertainty, increase consistency, and promote a common understanding and set of expectations regarding the NG911 system.

Although there is broad agreement about the inherent value of NG911 and some of its key characteristics, there is a lack of consensus on crucial points even within the public safety community itself as to the appropriate expectations for the future system. As such, there is a demonstrated need to identify the core capabilities and requirements of the NG911 system, so as to promote an effective deployment and avoid fragmentation of the user experience. In any event, the Commission should not encourage the migration away from legacy 9-1-1 systems until additional technical work for NG911 systems is completed.

Additionally, the record developed in this proceeding indicates widespread concern about the potential of uncertainty regarding liability protection to hinder the smooth rollout of NG911 services. Service providers, vendors, public safety, and related entities will require clear and robust liability protection to ensure that their participation in the NG911 ecosystem will not be inhibited by the inherent risks of the desired NG911 capabilities. The Commission should therefore engage in a comprehensive review of NG911 federal and state liability protections.

Comments submitted for the Commission’s Notice of Inquiry demonstrate nearly uniform agreement about the significant challenges to adapting Short Message Service (“SMS”) text messaging for emergency communications. CTIA supports efforts underway to evaluate the technical feasibility of non-voice communications to legacy 9-1-1 systems as transitional solutions to NG911. However, CTIA continues to believe that transitional or interim solutions to NG911 raise significant policy issues that will need to be addressed by all stakeholders, including whether limited industry and public resources are best allocated to such transitional approaches. The Commission should note that any transitional solutions will require significant public education initiatives to properly manage user expectations.

The record also highlighted the importance of funding issues to any comprehensive examination of the NG911 transition. Numerous respondents acknowledged the crucial role of identifying an appropriate and responsible funding model to support the development, deployment, and maintenance of NG911. The Commission should collaborate with the appropriate federal, state, and local governments to examine the challenges posed by the current funding model and identify solutions.

Finally, managing public expectations will be essential to preventing confusion about the capabilities and limitations of the new system, and to maximizing its public benefits. CTIA suggests that a focused outreach campaign be targeted to persons with disabilities, to ensure that accurate information is disseminated about the NG911 functionalities most relevant to them. The Commission also should take this opportunity to work with the public safety community to develop reasonable standard procedures to ensure that NG911 deployments proceed in an organized way. Respondents also agreed that the public safety community will have to develop its own training and operational procedures to make certain that the full potential of the NG911 system can be realized.

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CTIA—The Wireless Association® (“CTIA”) hereby submits these reply comments in response to the record compiled in the above-captioned proceeding.

I. INTRODUCTION

The record compiled in the first round of this proceeding illustrates clearly the multi-stakeholder collaborative effort that has been ongoing for years to advance the development of NG911. As CTIA explained in its initial comments, while substantial progress has been made developing technical and operational solutions for achieving the NG911 transition, much more work remains. While the Commission should heed the calls of many respondents to let the standards development process proceed unimpeded, the record demonstrates that there are several important aspects of the NG911 transition that warrant the Commission’s attention. Specifically, the record demonstrates that:

- There is a need to reach a consensus concerning the core capabilities and requirements of the NG911 system before regulations are considered or imposed.
- The Commission should engage in a comprehensive review of liability protections in an NG911 ecosystem.
- There are efforts underway to evaluate non-voice communications to legacy 9-1-1 systems, but significant impediments to the use of Short Message Service (“SMS”) for emergency communications exist.
- The Commission should promote a sensible and responsible 9-1-1 funding model.

- A successful NG911 transition will require coordinated and targeted public education and standardized training and operational procedures.

In these reply comments, CTIA highlights several of the common concerns noted by respondents that warrant the Commission’s attention. Although there is widespread agreement upon the questions that remain, a consensus has not yet developed—even within the public safety community—on some of the key components to the NG911 transition. Throughout this proceeding, the Commission should work with all stakeholders to bring clarity to each of these issues.

II. THE PUBLIC INTEREST DEMANDS AGREEMENT ON THE CORE FUNCTIONS OF AN NG911 SYSTEM.

The record supports CTIA’s observation that the Commission should coordinate with the various stakeholders to develop a national understanding of the core functions of a NG911 system.¹ A range of respondents representing all stakeholder groups concur that ensuring consistency in the operation and performance of an NG911 system will be essential to managing consumer expectations and preventing confusion.² Requiring service providers and manufacturers to support a wide variety of applications and data types that may not be uniformly

¹ Comments of CTIA—The Wireless Association®, PS Docket No. 10-255 at 16 (filed Feb. 28, 2011) (“CTIA Comments”).

² *See, e.g.*, Comments of AT&T Inc., PS Docket No. 10-255 at 29 (filed Feb. 28, 2011) (“AT&T Comments”); Comments of Sprint Nextel Corporation, PS Docket No. 10-255 at 6-7 (filed Feb. 28, 2011) (“Sprint Nextel Comments”); Comments of Qualcomm Incorporated, PS Docket No. 10-255 at 9 (filed Feb. 28, 2011) (“Qualcomm Comments”); Comments of the Telecommunications Industry Association, PS Docket No. 10-255 at 2 (filed Feb. 28, 2011) (“TIA Comments”) (NG911 deployment should focus on a subset of capabilities that can be deployed nationwide); Comments of Dash Carrier Services LLC, PS Docket No. 10-255 at 7 (filed Feb. 28, 2011) (“Dash Comments”) (the Commission should define the baseline services customers can expect to receive); Comments of the District of Columbia Office of Unified Communications, PS Docket No. 10-255 at 38 (filed Feb. 28, 2011) (“DC Comments”); Comments of the National Emergency Numbering Association, PS Docket No. 10-255 at 6-7 (filed Feb. 28, 2011) (“NENA Comments”); Comments of the VON Coalition, PS Docket No. 10-255 at 4 (filed Feb. 28, 2011) (“VON Coalition Comments”); Comments of Richard Barnes and Alissa Cooper, PS Docket No. 10-255 at 5, 8-9 (filed Feb. 28, 2011) (“IETF.ECRIT Comments”).

adopted by PSAPs will waste resources, lead to fragmentation in NG911 deployments, and ultimately create inconsistent and unreliable user experiences for citizens during times of emergency. As CTIA and others have recommended, the Commission should work with all interested parties and subject matter experts to develop a consistent national understanding of the core capabilities and requirements of the NG911 system. In any event, the Commission should not encourage the migration away from the legacy 9-1-1 systems until this understanding and related technical work for NG911 systems is completed.

Although consistency across NG911 deployments will be essential to an orderly NG911 rollout and will serve the public interest, there exists consensus in the record that the Commission should not apply NG911 obligations to a broad range of Internet-enabled devices. In the *NG911 Notice*, the Commission asks whether “every consumer device with Internet or cellular connectivity and a suitable user interface” should be required to have 9-1-1 calling capabilities.³ The record was uniform in its opposition to this suggestion. As CTIA explained in its initial comments, the proposal is jurisdictionally problematic, indeed, “just because a technology is *capable* of contacting 9-1-1 does not mean that the Commission may *require* it to do so.”⁴ Moreover, various public safety and commercial service respondents argued that such a broad mandate could create confusion, produce suboptimal user experiences, and chill innovation while providing little public benefit in return as consumers may not widely utilize devices like portable media players and video game consoles to contact 9-1-1.⁵ Rather than

³ See Framework for Next Generation 911 Deployment, PS Docket No. 10-255, *Notice of Inquiry*, FCC 10-200, 25 FCC Rcd 2297 at ¶ 52 (2010) (“*NG911 Notice*”).

⁴ CTIA Comments at 8.

⁵ See, e.g., AT&T Comments at 17-18; Joint Comments of the International Association of Chiefs of Police, the International Association of Fire Chiefs, and the National Sheriffs’ Association, PS Docket No. 10-255 at 4 (“IACP/IAFC/NSA Comments”); Comments of the Alarm Industry Communications Committee, PS Docket No. 10-255 at 13-14 (“AICC”).

pursuing this problematic suggestion, the Commission would do better to focus on the development of the core functionality of the NG911 system, and on dedicating resources toward public education, to ensure that consumers fully understand the range of devices and functionalities integrated with the NG911 system.⁶

III. THE RECORD CLEARLY DEMONSTRATES THAT THE COMMISSION MUST CONDUCT A COMPREHENSIVE REVIEW OF LIABILITY PROTECTIONS.

A wide range of industry and public safety respondents raised concerns about the adequacy of liability protection for entities that is critical to NG911 deployment and development.⁷ These concerns demonstrate that the Commission must engage in a comprehensive review of the protections provided in an NG911 paradigm. As CTIA explained in its initial comments, the wide variety of new entities, media and applications contemplated in the NG911 world challenges existing liability protections. Accordingly, CTIA urged the Commission to examine how current liability protections may come up short when applied to NG911 service providers.⁸ CTIA identified three such inadequacies for the Commission's consideration. First, though federal law may protect wireless providers from liability in certain NG911 contexts, ambiguity exists as to whether "the full range" of NG911 technologies and

Comments"); Comments of the Alliance for Telecommunications Industry Solutions, PS Docket No. 10-255 at 17-18 ("ATIS Comments"); Comments of the Consumer Electronics Association, PS Docket No. 10-255 at 6-7 ("CEA Comments").

⁶ See *infra* Section VI.

⁷ See, e.g. Comments of Motorola Solutions, Inc., PS Docket No. 10-255 at 12-13 (Feb. 28, 2011) ("Motorola Solutions Comments") ("National consistency in liability protection will be essential to encouraging investment and promoting a smooth NG911 transition."); Comments of the Association of Public-Safety Communications Officials International, Inc., PS Docket No. 10-255 at 9 (Feb. 28, 2011) ("APCO Comments") (stating that liability issues are legitimate and valid concerns).

⁸ See CTIA Comments at 11.

service providers has protection.⁹ Second, wireless providers may face liability under state tort or statutory actions because states “vary significantly in terms of the duties of care and potential liabilities imposed on 9-1-1 activities.”¹⁰ Third, because NG911 relies on new technologies, processes, and data flows, wireless providers may face liability under new causes of action that never posed a concern in the legacy 9-1-1 environment.¹¹ In light of these challenges, without uniform liability protection for all NG911 service providers an effective NG911 transition could be seriously delayed.¹²

Many respondents echoed CTIA’s concerns about the adequacy of liability protection for NG911 stakeholders and the consequences for NG911 in the absence of clearly-defined protection from legal exposure. AT&T, Sprint Nextel, Motorola Solutions, and the Telecommunications Industry Association (“TIA”) all expressed support for comprehensive liability protection for NG911 service providers.¹³ Support for uniform liability protection extends beyond the telecommunications sector, as well. For example, the National Emergency Number Association (“NENA”) observed that, without robust liability protection for equipment

⁹ See CTIA Comments at 11 (identifying Section 201 of the New and Emerging Technologies 911 Improvement Act (“NET 911 Act”) as the primary source of federal liability protection for NG911 services and raising concerns that the NET 911 Act may not cover all parties contributing to NG911 services).

¹⁰ See *id.* at 11-12.

¹¹ See *id.* at 12.

¹² See *id.*

¹³ AT&T Comments at 25-26 (expressing support for “full liability protection to all originating network providers”); Sprint Nextel Comments at 8 (stating that existing liability protections “need to be expanded to extend to all forms of data included as part of NG911” and that wireless providers would need protection from liability for “communications originated by third party providers”); Motorola Solutions Comments at 12 (“Federal, state and local liability protections need to be strengthened, where appropriate, to ensure that uncertainty about potential liability does not delay NG911 deployment.”); TIA Comments at 6-7 (supporting liability protection for “all forms of information pushed to a PSAP or pulled from external sources by a PSAP regardless of the platform over which information travels”).

manufacturers, database suppliers and application developers, NG911's ability to take advantage of auxiliary data will be limited.¹⁴ Other prominent members of the public safety community also called for close scrutiny of this issue.¹⁵

The record demonstrates that the Commission should conduct a comprehensive review of liability protection for NG911 service providers to ensure that NG911's full potential can be realized. Uniform liability protection is critical for a successful NG911 deployment. The Commission should work with Congress and other governmental bodies as necessary to remove the cloud of uncertainty that hangs over the NG911 transition because of this unresolved issue.

IV. THE RECORD HIGHLIGHTS SUPPORT FOR THE EVALUATION OF NON-VOICE COMMUNICATIONS BUT CHALLENGES THE USE OF SMS FOR EMERGENCY COMMUNICATIONS.

The overwhelming majority of respondents agreed that there are significant challenges posed by the conversion of SMS text messaging into a current or next generation emergency communications medium. Respondents explained that SMS does not have native functionality for the provision of automatic location information, and its nature as a best effort, store-and-forward service does not offer sufficient reliability for emergencies.¹⁶ The Wichita-Wilbarger 9-1-1 District summarized the position of many respondents from both the

¹⁴ See NENA Comments at 21.

¹⁵ See, e.g., APCO Comments at 10; Comments of St. Louis Emergency Communications Commission, PS Docket No. 10-255 at 8-9 (Feb. 28, 2011) ("St. Louis County Comments").

¹⁶ See, e.g., APCO Comments at 2, NENA Comments at 14-15, Joint Comments on the Texas State Commission on Emergency Communications and the Texas 9-1-1 Alliance, PS Docket No. 10-255 at 4 (Feb. 28, 2011) ("Texas 911 Comments"), Comments of the Wichita-Wilbarger 9-1-1 District, PS Docket No. 10-255 at 3 (Feb. 28, 2011) ("Witchita-Wilbarger 9-1-1 Comments"), AT&T Comments at 11-15, Sprint Nextel Comments at 3, Comments of T-Mobile USA, Inc., PS Docket No. 10-255 at 8-13 (Feb. 28, 2011) ("T-Mobile Comments"), Motorola Solutions Comments at 3, Qualcomm Comments at 9-10, VON Coalition at 5, ATIS Comments at 5-8, IETF ECRIT Comments at 11, Comments of the Center for Democracy and Technology, PS Docket No. 10-255 at 5-6 (Feb. 28, 2011) ("CDT Comments"), CEA Comments at 4, TIA Comments at 7.

public safety community and industry when it stated that due to these difficulties, “SMS text messaging is distinctly unsuitable for communication with emergency services.”¹⁷

Despite the challenges with SMS, it is clear that non-voice communications will be an essential capability for NG911. Text messaging has become a favored communications medium for many wireless users, and the potential benefits for some persons with disabilities to be able to summon emergency services using text messages would be particularly significant. The wireless industry is prepared to work with the public safety and accessibility communities through relevant technical and standards-setting bodies to evaluate the technical feasibility, as well as the costs, benefits, and consequences, of developing interim solutions to allow citizens to engage current emergency services via non-voice communications to legacy 9-1-1 systems.

For example, in the time since the close of the initial comment period in this proceeding, the Alliance for Telecommunications Industry Solutions (“ATIS”) announced the launch of its Non-Voice Emergency Communications Incubator initiative, which has the mission of identifying a robust text-based communication medium that is compatible with NG911.¹⁸ In its initial comments, CTIA raised questions about whether it would be the most efficient use of resources to focus on developing an interim solution for emergency use of SMS, or if instead attention should be directed toward the next generation of non-voice communications protocols currently being developed within 3GPP and others.¹⁹ The ATIS Incubator can be a vehicle for the wireless industry to explore these and related questions.

¹⁷ Witchita-Wilbarger 9-1-1 Comments at 3.

¹⁸ See ATIS, Press Release: “ATIS Launches Non-Voice Emergency Communications Initiative” (Mar. 10, 2011) *available at* <http://atis.org/PRESS/pressreleases2011/031011.html>.

¹⁹ See CTIA Comments at 5.

Although many respondents expressed the same concerns raised by CTIA, it is worth noting that there is not complete uniformity regarding the appropriate approach to SMS. In particular, some difference of opinion exists within the public safety community about the suitability of SMS for emergency services.²⁰ Still other public safety respondents appeared open to considering transitional support for SMS, but seemed focused on next generation non-voice communications.²¹ These disagreements demonstrate why, as discussed above, it is so important that the Commission work with all interested stakeholders to reach consensus on the core functionality of the NG911 system.

CTIA has concerns with the proposals of some respondents, who would leave to local jurisdictions the determination of which specific communications services to support.²² Such a solution could lead to serious fragmentation among NG911 implementations, and would be contrary to the public interest. In addition to wasting PSAP and industry resources through inefficiency and delaying the rate of NG911 deployment, a lack of uniformity across jurisdictions with respect to the types of communications supported by NG911 will reduce overall confidence in the system. This approach could seriously confuse consumers at the exact time when they need certainty – when they are trying to contact 9-1-1. Indeed, compounding an inconsistent rollout schedule with inconsistency in the services supported could be a recipe for mass public confusion.

²⁰ Compare Comments of the Transportation Safety Advancement Group, PS Docket No. 10-255 at 1 (Feb. 28, 2011) (“TSAG Comments”) (SMS compatibility should be deployed despite the challenges) with Wichita-Wilbarger 9-1-1 Comments at 3-5 (SMS is unsuitable for emergency communications).

²¹ See, e.g., APCO Comments at 4; NENA Comments at 14-15.

²² See, e.g., Wichita-Wilbarger 9-1-1 Comments at 4-5 (despite the manifest problems with SMS, the decision to deploy should be in local hands); Texas 9-1-1 Comments at 6 (although text messaging should be a core element, any requirement to provide this service should turn on PSAP readiness).

V. THE COMMISSION MUST EXAMINE THE 9-1-1 FUNDING MODEL.

Though the Commission purported not to address NG911 funding issues in this proceeding,²³ many respondents observed that NG911's long-term success depends on the identification of an appropriate and responsible funding model.²⁴ As CTIA explained in its initial comments, the cost of national NG911 deployment has not been adequately researched and uncertainty remains over how NG911 will be funded.²⁵ Moreover, there is significant inefficiency and dysfunction in the current 9-1-1 funding model that should not be carried over into the NG911 transition. This lack of clarity threatens NG911 deployment. In order to ensure an effective and timely NG911 transition, stakeholders must understand how the system will be funded and what mechanisms will be in place to ensure the sensible and equitable distribution of resources. The record clearly demonstrates that the Commission must examine the 9-1-1 funding model.²⁶

²³ See *NG911 Notice* at n.22.

²⁴ See CTIA Comments at 13 (arguing that the Commission should not ignore “the need to address the fractured and inefficient 9-1-1 funding system”); Motorola Solutions Comments at 9 (urging the Commission not to overlook the need to identify a secure funding source for NG911); APCO Comments at 1-2 (asserting a need to explore funding sources for NG911); VON Coalition Comments at 3 (stating that funding is critical to NG911).

²⁵ See CTIA Comments at 13 (noting that expenditures required for the NG911 transition have not been adequately identified).

²⁶ See, e.g., AT&T Comments at 27-28; Motorola Solutions Comments at 9; APCO Comments at 1-2; St. Louis County Comments at 2; TSAG Comments at 5; VON Coalition Comments at 3. See also Federal Communications Commission, *Second Annual Report to Congress on State Collection and Distribution of 911 and Enhanced 911 Fees and Charges* 10-12 (Aug. 13, 2010) available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-300946A1.pdf (reporting that at least thirteen states used or may have used 9-1-1 funds for non 9-1-1 purposes in 2009); Federal Communications Commission, *Report to Congress on State Collection and Distribution of 911 and Enhanced 911 Fees and Charges* 9-10 (Jul. 22, 2009) available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-292216A2.pdf (reporting that at least twelve states used or may have used 9-1-1 funds for non 9-1-1 purposes in 2008).

Respondents suggested a variety of ways for the Commission to address NG911 funding. For example, AT&T suggested that the Commission follow the forthcoming recommendation of the Communications Security, Reliability and Interoperability Council convene a “blue-ribbon panel” to study 9-1-1 funding issues.²⁷ Furthermore, various respondents joined CTIA in encouraging the Commission to collaborate with state and local governments and other federal entities to identify more specific funding needs.²⁸

The Commission should work with all interested stakeholders and regulators to provide greater clarity with regard to the costs of the NG911 deployment and to improve upon the inherent weaknesses of the current 9-1-1 funding model. An effective NG911 funding model would provide for the responsible collection and expenditure of 9-1-1 funds.²⁹ While it is entirely appropriate for local, state and national authorities to each have a role in 9-1-1 oversight, this multi-jurisdictional regulatory regime is not without its problems. As CTIA explained previously, the current multi-layered regime has created a situation where duplicative 9-1-1 fees may be collected on the same service by different levels of government without the guarantee that collected funds will support emergency communication services.³⁰ Moreover, as the Commission has recognized, misappropriation of 9-1-1 fees is widespread among some states, contrary to federal policy.³¹ Thus, as suggested by Motorola Solutions, the Commission should

²⁷ AT&T Comments at 28.

²⁸ CTIA Comments at 13; Motorola Solutions Comments at 10; Qualcomm Comments at 2.

²⁹ Motorola Solutions Comments at 10 (stating that the Commission should ensure that any funds are “appropriately used”); Qualcomm Comments at 2 (stating that any funding mechanism should be fair).

³⁰ CTIA Comments at 14 (noting that because 9-1-1 oversight is conducted on multiple levels, “duplicative fees are collected on the same service by different levels of government.”).

³¹ *See supra* note 26.

strive to ensure that “[f]unds and fees collected and monies appropriated for 911 [are] reserved only for use in connection with 911-related operations and development.”³²

A successful 9-1-1 funding model also would account for NG911’s unique capabilities. Because NG911 relies on new services and technologies, respondents argued that NG911 funding should be “technologically neutral” to prevent the burden of funding the system from falling disproportionately on certain types of services over others.³³ An uneven distribution of fees would otherwise give an unfair competitive advantage to competitors in the voice and messaging markets.

NG911 deployment will suffer if these important funding issues are not addressed. Motorola Solutions called the funding issue “fundamental” because as long as uncertainty about funding exists, NG911 stakeholders have “little incentive . . . to push new technologies to trial and to begin planning” for the transition.³⁴ Indeed, if these funding issues are not resolved, the Commission may even see a repeat of the difficulties experienced in Phase II E911 deployment, where deployment of advanced location technologies has been delayed by insufficient resources at the PSAP level, despite the industry’s readiness to proceed.³⁵

Thus, as a threshold matter, it is essential for the Commission to examine the NG911 funding model. The existing 9-1-1 funding model is already problematic and will only become

³² Motorola Solutions Comments at 11.

³³ *See, e.g.*, AT&T Comments at 27-28; CTIA Comments at 14-15.

³⁴ Motorola Solutions Comments at 10.

³⁵ The lack of an adequate funding mechanism delayed the deployment of Phase I E-911 service for many years, and required the FCC to revisit its initial E-911 rules. *See Commission Seeks to Facilitate Wireless E911 Implementation and Requests a Report*, Public Notice, 14 FCC Rcd 11138 (1999) (stating that “...only seven percent [of PSAPs] answered yes to Phase I implementation. The primary reason given for [PSAP failure to implement Phase I] is the lack of a funding mechanism....”)

more so with the complex services that NG911 aims to deploy. By addressing funding issues at this juncture, the Commission can set NG911 on a smoother path to deployment.

VI. THE RECORD DEMONSTRATES THAT EDUCATION, TRAINING AND CONSISTENT PROCEDURES WILL BE KEY TO THE SUCCESS OF NG911.

Diverse respondents discussed the need for a coordinated education and training program to ensure that both the public safety community and the public at large fully understand and embrace the new functionality of NG911. As CTIA explained in its initial comments, public education will be necessary to ensure that wireless consumers' expectations about emergency communications match the technical and operational realities of NG911.³⁶ Furthermore, in light of the myriad new capabilities of the NG911 system, a successful transition will require the development of new and consistent training programs and operational procedures for the public safety community to ensure orderly and efficient adoption of the new system.

Various respondents echoed CTIA's suggestion that, upon formalizing the standards and deployment plans, a coordinated public education effort will be required to ensure that citizens understand the strengths and weaknesses of the new system, and how to use it.³⁷ As APCO explained, "[i]magery and video will increase the potential for PSAPs to better assess the status of an incident, *if* implemented in conjunction with a public education campaign that carefully sets consumer expectations."³⁸ This dynamic underscores the need for recognized core NG911

³⁶ CTIA Comments at 15-16.

³⁷ *See, e.g.*, AT&T Comments at 33-34, Motorola Solutions Comments at 5, APCO Comments at 8, NENA Comments 14-15, St. Louis County Comments at 2-3, TSAG Comments at 4-5, CDT Comments at 5, Comments of West Wireless Health Institute, PS Docket No. 10-255 at 3 (Feb. 28, 2011).

³⁸ APCO Comments at 3; *see also* Motorola Solutions Comments at 14 ("This education will have to be ongoing and keyed to the actual deployment of new services so that people know what functionalities will be available in their regions, and on what schedule they will be deployed.").

functionalities, discussed above.³⁹ Successfully managing consumer expectations so as to promote trust and understanding of the NG911 system will depend upon effective public education about the actual functional characteristics of the NG911 system.

In addition to the general public education programs, CTIA believes that targeted education campaigns may be appropriate for the disability community. NG911 holds great promise to bring people with disabilities new opportunities for emergency communications. A special focus on these communities, however, may be required to ensure that accurate information is disseminated about how the NG911 system may best fulfill their needs. It is essential to manage expectations by all consumers as to how the new technology will operate, and the industry is committed to working with all stakeholders to develop such an educational campaign.⁴⁰

Finally, several respondents agreed with CTIA that, in addition to public education, significant work must be done within PSAPs to prepare for the new emergency communications paradigm. As Motorola Solutions stated in its comments “[w]ithout sufficient training and confidence, PSAP workers will, at best, fail to take full advantage of the new functionalities. At worst, complex new systems on which 911 workers have not been properly trained could lead to mismanagement of NG911 calls, with tragic results.”⁴¹ PSAPs must develop internal best practices and formal training to ensure that they are capable of dealing with the new data.

³⁹ See *supra* Section II.

⁴⁰ At the same time as it considers targeted outreach to persons with disabilities, the Commission should provide clarity both on the scope of its authority under the Twenty-First Century Communications & Video Accessibility Act of 2010, Pub. L. 111-260, with respect to the regulation of the various new entities that will be involved in the provision of NG911 services, and on the interaction between the requirements of that Act and any new NG911 obligations.

⁴¹ Motorola Solutions Comments at 15; see also APCO Comments at 3 (“Significant training will also be required for PSAPs to ensure that telecommunicators are able to effectively

Additionally, CTIA reiterates its earlier call for the Commission and the public safety standards community to consider options for normalizing processes for implementing new technologies and requirements by PSAPs.⁴² The Commission should take this opportunity to work with the public safety community to develop reasonable standard procedures to ensure that, to the extent possible, NG911 deployments proceed smoothly, in an organized way, and in collaboration with the local service providers.

VII. CONCLUSION

CTIA once again applauds the Commission for the high level of attention it is giving to these important issues. The wireless industry is fully committed to seeing a successful transition to NG911. While much of the important technical, operational, and standards development work is ongoing in collaborative industry and public safety venues, there are several aspects of NG911

interpret, manage and utilize the information being received via new methods of communication.”); NENA Comments at 34 (“The development and dissemination of information about NG9-1-1 capabilities and functionalities is especially important for 9-1-1 Authorities and others who must make decisions about NG9-1-1 deployments.”).

⁴² CTIA Comments at 17.

development that could benefit from the Commission's guidance. As discussed above, CTIA respectfully urges the Commission to collaborate with all relevant industry, public safety, government, and consumer stakeholders to bring additional clarity to these matters.

Respectfully submitted,

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