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 BY 211US

Pursuant to the Federal Communications Commission's ("FCC") schedule for the Federal Communications Commission's Notice of Inquiry released December 21, 2010 in the matter of the Framework for Next Generation 911 Deployment, PS Docket No. 10-255, Notice of Inquiry ("NOI"), 211US[1] submits its reply comments.

INTRODUCTION

On December 21, 2010, the FCC issued an NOI (PS Docket No. 10-255) to address how Next Generation 911 (NG911) can enable the public to obtain emergency assistance by means of advanced communications technologies beyond traditional voice-centric devices. Specifically, the NOI raised questions related to N11 Numbers and Other Services for Emergency Communications.[2] On February 28, 2011, 211US submitted comments with three main ideas. First, 211 should be considered in the development of the framework for NG911 and rationale for such. Second, as the ultimate authority over N11s and certain telecommunications devices, the FCC should guide efforts to coordinate and integrate services in a Next Generation environment and to mitigate challenges. Third, 211US is willing to work collaboratively with the FCC and partners on planning and implementation, including pilot projects.

[1] 211US is the entity that represents 211, as it originated as a partnership between the Alliance of Information and Referral Systems and United Way Worldwide, and as it evolved in a relationship with statewide 211 entities and individual 211 centers. 211US is guided by a 16-member steering committee and holds memoranda of understanding with 40+ state 211 entities. 211US seeks to ensure that 211 is "excellent, everywhere and always."

[2] *Framework for Next Generation 911 Deployment*, Notice of Inquiry, PS Docket 10-255,FCC 10-200 (2010), paragraph 60 on page 21.

DISCUSSION

While many comments did not address the issue of N11s[3] specifically, at least seven[4] of the comments filed in Docket No. 10-255 support the ideas that N11 Numbers and other emergency communications utilize a similar technical structure and/or that cost savings and other cost efficiencies may be achievable through integration. The State of California supports "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" (Comments, page 13).

Examples and excerpts from comments filed by other organizations support N11 inclusion in NG911 framework and/or respond to questions in paragraph 60 follow.

The current and former chairs of the IETF (Internet Engineering Task Force) GEOPRIV (Geographic Location/Privacy) and ECRIT (Emergency Context Resolution with Internet Technologies) working groups offered:

> *"There is no technical difference between IP calling to 9-1-1 and other N11 numbers. At a technological level, all of these numbers can take advantage of the same geolocation and call routing resources as NG911. The ECRIT architecture anticipates this multiple use by creating an extensible system of identifiers for services, the so-called \service URNs" [15]. The only difference between a 911 call and a call to an N11 number is which service URN is used, an emergency URN from the "urn:service:sos" class, or a non-emergency URN such as those in the "urn:service:counseling" class"* (Current and Former Chairs Comments, page 16).

The Radio Regulatory Technical Advisory Group ("the RR-TAG") within IEEE 802 (Local and Metropolitan Area Networks Standards Committee) responded:

> *"We expect to share most of the infrastructure with only minimal distinction for ES calls….We expect only to have a differentiation between emergency and non-emergency calls. This distinction will not be based on the numeric structure of the N11 PSTN dial string. We expect there to be*

[3] Other Specialized NG911 Applications, N11 Numbers and Other Services for Emergency Communications, paragraph 60, page 21 and Liability concerns, paragraph 72, page 25.
[4] See APCO Comments at 7, Current and Former Chairs of IETF, ECRIT and GEOPRIV Comments at 16, IEEE Comments (filed under Michael Lynch) at 5, LR Kimball Comments at 17, NENA Comments at 20-21, Public Safety Communications Office of the California Technology Agency at 13 and Transportation Safety Advancement Group Comments at 4. Additionally, NESIC Comments address N11 and other emergency communications throughout all its pages.

sufficient address space in the SIP header to address multiple emergency services or sub-types thereof" (Michael Lynch Comments, page 5).

The National Emergency Number Association, NENA, expresses its support for inclusion of other N11s in NG911 framework:

> *"NENA recognizes that emergencies may be identified through N-1-1 service requests and has long advocated for a straightforward transfer function between N-1-1 services and 9-1-1. While NG9-1-1 ESInets will be designed to support emergency services, it is possible and appropriate that N-1-1 and 9-1-1 services could share NG9-1-1 components, such as GIS database resources, for call routing purposes. Likewise, the services could share the underlying IP transport network, provided data could be appropriately secured and segregated. States and localities should therefore carefully review the benefits that could be realized through such an arrangement and plan their regulations and investments accordingly. As NG9-1-1 is more widely deployed and PSAP operations evolve to handle NG9-1-1 information flows, the ability to offer N-1-1 services on an IP network that also supports ESInets and NG9-1-1 should be explicitly supported"* (NENA Comments, pages 20-21).

APCO, the Association of Public-Safety Communications Officials-International, Inc., offers with regard to N11s:

> *"Integration of N11 services in NG911 systems merits consideration, provided that interconnection of those N11 services does not negatively impact the receipt or transmission of emergency calls. The mission of some services, such as 311 and Poison Control, may be more tightly integrated with 911 in comparison to other N11 services. Common technology platforms for some of these services may present an opportunity for cost savings, interoperability and improved service"* (APCO Comments, page 7).

L.R. Kimball, a CDI company, in discussing requests for emergency help, writes:

> *"All requests for emergency help should have access to the 911 system, whether from dedicated providers, third-parties or others. For example, many N11 services have public safety roles and can be the initial input of information in an emergency, such as a gas pipeline breach that was first reported to 811. Developing processes to enable this critical interoperability is important"* (LR Kimball Comments, page 17).

The Transportation Safety Advancement Group (TSAG) addresses the question of N11s directly:

> *"TSAG believes that NG911 operations design and deployment presents an opportunity for systems and PSAPs to 'capture' relevant N11 services data, such as 511 traffic and traveler information while 'filtering' or rerouting calls and data from non emergency N11 sources. This opportunity may be the focus of NG911 design advances and of operational functions"* (Transportation Safety Advancement Group Comments, page 3).

CONCLUSION

For the reasons stated in our original filing and as supported by comments filed by APCO, IETF GEOPRIV & ECRIT, LR Kimball, IEEE, NENA, NESIC and Transportation Safety Advancement Group, 211US supports FCC consideration of 211 and other N11s in development of the Next Generation 911 Framework. While concerns about N11 prioritization, funding and policy issues will need to be addressed, it is clear that N11s share much of the same technical functionality and that it is possible to reduce cost and improve service by integrating some of these services on a common technology platform.

211US remains committed to working with the FCC and other partners on the next steps in considering a Next Generation *N11* framework.

Respectfully Submitted,

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