

NENA

The 9-1-1 Association

1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

August 19, 2011

Dear Ms. Dortch:

On Friday, August 19th, I, along with my colleague Trey Forgety, NENA Director of Government Affairs, met with Chairman Genachowski as well as Amy Levine of the Chairman's Office, and Jennifer Manner, Deputy Chief of the Public Safety and Homeland Security Bureau. During that meeting, we discussed three topics relevant to the Commission's Inquiry Proceeding in PS Docket Number 10-255, *In re Framework for Next Generation 911 Deployment*, one of which is also relevant to the ongoing proceedings in PS Docket Number 06-229, *In re Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band*. In accordance with the Commission's rules applicable to these permit-but-disclose proceedings, we therefore submit this *Notice of Ex Parte Presentation*.

First, we discussed the role and importance of standards in enabling innovative, consumer-focused emergency-calling services and ensuring nation-wide consistency of minimum service features. We explained the aspects of NG 9-1-1 currently covered by NENA's own "i3" standard, as well as the aspects of NG 9-1-1 systems that i3 does not fully describe. In addition, we described how we expect NG 9-1-1 systems will access caller location as well as other caller-associated data such as medical records. We also explained the i3 is not, by itself, sufficient to describe a functioning NG 9-1-1 system, and spoke briefly about NENA's ongoing standards and procedures development work.

Second, we explained our view of how the Commission could facilitate the roll-out of NG 9-1-1 by working collaboratively with state utility commissions. In particular, we noted that some regulations based on legacy service models such as monopoly wireline service may impede or outright prohibit the provisioning of NG 9-1-1 service by competitive entrants or the disaggregation of various aspects of NG 9-1-1 service. We stressed the importance of leadership by the Commission and referred staff to our *Next Generation 9-1-1 Transition Policy Implementation Handbook*, available on the NENA website.

Finally, we discussed the importance of interoperability considerations the broader emergency communications enterprise. We emphasized the need to ensure end-to-end interoperability from consumer devices, through NG 9-1-1 systems, to field responders' devices. We explained the central role that Public Safety Answering Points play in connecting consumers in distress with law enforcement, fire fighting, and emergency medical services, and highlighted the need for detailed, enforceable standards for interoperability in both NG 9-1-1 systems and public safety broadband networks.

Sincerely,



Brian F. Fontes

CEO