

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
MULTILINE TELEPHONE SYSTEMS ) DA 12-798, CC No. Docket 94-102, WC Docket  
AND NEXT GENERATION 9-1-1 ) No. 05-196, PS Docket No. 07-114, PS Docket  
 ) No. 10-255  
 )

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following comments in response to the Commission’s *Public Notice*, DA 12-798 (released May 21, 2012), in the above-captioned proceedings regarding the ability of multiline telephone systems (MLTS) to provide E9-1-1 capability.

Founded in 1935, APCO is the nation’s oldest and largest public safety communications organization. Most APCO members are state or local government employees who manage and operate communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO appears regularly before the Commission on a wide range of public safety communications issues.

I. INTRODUCTION

The issue of E9-1-1 capability for MLTS has an extraordinarily long history at the Commission. In 2005, APCO commented that

It has been nearly eleven years since the Commission first sought comment in this proceeding regarding E9-1-1 capability for MLTS. In the intervening years, the underlying problem has not gone away. Countless business, educational, and residential phone systems across the nation continue to operate without the ability to identify the specific location from which a 9-1-1 call is placed. This absence of E9-1-1 capability creates life-threatening delays for emergency responses, especially where an MLTS provides service to widely dispersed locations. Without accurate E9-1-1 capability, first responders could be dispatched to the

wrong address or to a large building with little clue as to the precise location of the emergency.<sup>1</sup>

Seven years later, and now *eighteen years* after the Commission initiated its proceeding on MLTS and E9-1-1,<sup>2</sup> the problem has still not gone away. Many office workers, hotel guests, apartment dwellers, students, teachers, customers, and members of the general public remain at risk that a 9-1-1 call from a MLTS will not provide a PSAP with correct, or even remotely accurate, location information. Valuable time will be lost as first responders search multiple addresses, buildings, and floors, knocking on doors in a desperate effort to find the emergency. Therefore, APCO is pleased that the Commission is revisiting the issue and hopes that the next step will be a notice of proposed rulemaking, and then final action to adopt rules requiring MLTS devices to provide caller location information.

The Commission seeks comment on the feasibility of MLTS equipment to provide precise caller location. APCO looks forward to the comments from carriers, equipment manufacturers and technology providers on this issue.

The Commission also inquires as to how best to measure and quantify the benefits of MLTS providing E9-1-1 capability. APCO is not aware of any current national database that would provide the relevant information, but we will explore methods of collecting data at least from larger PSAPs/agencies that are more likely to have sophisticated information gathering systems.

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<sup>1</sup> Comments of APCO Regarding the Status of State Actions to Achieve Effective Deployment of E9-1-1 Capabilities for Multi-Line Telephone Systems, CC Docket 94-102 (filed Feb. 25, 2005).

<sup>2</sup> Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Notice of Proposed Rulemaking*, 9 FCC Rcd 6170 (1994).

## II. MODEL LEGISLATION COMMENTS

The *Public Notice* discusses and seeks comments on the NENA Model Legislation “designed to encourage states to adopt standards and regulations that serve to improve the precision of 9-1-1 location information in an MLTS environment.” APCO is generally supportive of the Model Legislation and offers the following observations for the Commission’s consideration.

APCO concurs that Emergency Location Identification Number (ELIN) and Emergency Response Location (ERL) as used in the Model Legislation provide a necessary and appropriate distinction from the terms ANI and ALI. APCO also agrees that it is acceptable to use the street address of small buildings as a single MLTS ERL. Specifically, workspaces (small buildings) with less than 7,000 sq. ft. on a single level, located on a single contiguous property, need not be required to provide more than one ERL.

Unfortunately, the Model Legislation does not require that MLTS systems installed in temporary residence facilities (*e.g.*, hotels and college housing) also provide at least an ELIN that results in building/floor location or a private answering point. Temporary residence facilities typically have small, self-contained rooms behind locked doors, and thus pose an even more substantial problem than office facilities, many of which have open (or at least unlocked) spaces that are more easily searched. An individual experiencing an emergency in a temporary residence facility is also more likely to be alone, without witnesses or others in the same room who could provide assistance. Therefore, PSAPs need to know the specific room number for each temporary residence unit so first responders do not waste valuable time searching dozens of separate spaces.

The Model Legislation provides that the creation of ERL boundaries should not exceed fire alarm zones. The boundary of a fire alarm zone is highly subjective and may not line up well with workspace locations in a building. In reality, interior building renovations may modify alarm zone coverage as well as workspace locations. The number of ERL boundaries should not be restricted by the boundaries of fire alarm zones.

As the Commission notes, the Model Legislation recommends that MLTS E9-1-1 requirements be incorporated into the Commission's Part 68 rules.<sup>3</sup> APCO believes that the time has come to adopt such federal requirements. Previously the Commission concluded that states are in the best position to determine E9-1-1 deployment, while noting that it would re-visit the issue in the future, depending upon on the level of activity at the state level. Since completion of the Model Legislation in January 2000, only 16 states have adopted some form of MLTS legislation. Nevertheless, the general public continues to expect that a PSAP will automatically be provided a caller's location when they dial 9-1-1 from any telephone, regardless whether it is a single line, multi-line, or wireless device. Nor should it matter whether the state in which they are in has passed MLTS legislation.

### III. STANDARDS

The Commission seeks general comment regarding the status of standards to address MLTS and E9-1-1 capability. There are several organizations, such as APCO,<sup>4</sup> ATIS, IEEE, IETF, and NENA, that currently draft standards, technical specifications or best practices that have impact on E9-1-1 communications or telecommunications in general. The Commission should request that these organizations provide a formal list of existing documents and work in-

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<sup>3</sup> The Commission should also explore whether IP MLTS capability is best handled through Part 68 or other portions of the Commission's rules.

<sup>4</sup> For the Commission's information, APCO is an ANSI-certified standards body.

progress as it relates to E9-1-1 and MLTS . The Commission could also charter a group to perform a standards gap analysis to identify specific areas of need. Further standards should be set at a national level to assure continuity for the general public and interoperability between disparate public safety entities. However, the Commission should not incorporate or otherwise codify specific standards into its rules as that would slow future modifications as technologies advance.

### CONCLUSION

Therefore, for the reasons set forth above, the Commission should proceed with a Notice of Proposed Rulemaking to adopt nationwide MLTS E9-1-1 requirements.

Respectfully submitted,

/s/

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