

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

REGARDING:

IMPLEMENTATION OF THE MIDDLE CLASS TAX RELIEF AND JOB CREATION ACT OF 2012
PROVISIONS CONCERNING MULTI-LINE TELEPHONE SYSTEMS

PROCEEDING 94-102

COMMENTS OF:

911 ETC, INC.

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As a leading provider of E911 hosted solutions for the government, enterprises, schools and small businesses since 1997, 911 ETC is glad for the opportunity to respond to the Commission regarding the inquiry for E9-1-1 functionality requirements for MLTS systems. Our company's founder became aware of the glitch within our nation's 9-1-1 system while tasked as the project manager for implementing E9-1-1 at the Fortune 100 enterprise where he was employed. Realizing that multi-line telephone systems presented such a communication barrier in the event of an emergency, he determined to found a company that could assist MLTS owners in ensuring the safety of their employees, students, and guests. Today 911 ETC provides E9-1-1 service to hundreds of organizations across nearly all 50 states.

Over the past several years we've witnessed the evolution of E9-1-1 as it pertains to MLTS. We've seen states enact relevant legislation (18 states to date), and observed as the migration towards VoIP has served to heighten awareness that the problem even exists. Today, each organization's situation regarding E9-1-1 is truly unique: VoIP, soft phones, type of PBX,

employees working from home, and multiple other variables all contribute to complicating the scenario and presenting a challenge to the telecom administrator. As technology continues to advance, proper guidance at the federal level is more important than ever in ensuring the public is protected.

As communication becomes more IP centric, user mobility does present new problems for emergency responders; however, it also makes it less burdensome for MLTS providers to offer E9-1-1 service. Legacy devices need to be manually tracked during all move, add and change (MAC) activity. Attempting to keep this database of information up-to-date and accurate can be burdensome for a large organization. IP endpoints, while highly nomadic, are easily identifiable within the network via a discovery mechanism – often, a mechanism that is already inherent to the PBX.

Onsite notification alerting an organization's personnel of the emergency location is important, and helpful; most important is ensuring that the Public Safety Answering Point receives accurate location information when the 9-1-1 call is placed. If an emergency call is made from a multi-building organization, location information can be sent to the PSAP immediately notifying emergency responders as to which building they should respond. Even in a traditional PBX environment, endpoints can be assigned an Emergency Location Identification Number (ELIN), and matched up within an Emergency Response Location (ERL). An organization can divide its network up geographically to facilitate locating an emergency when a 9-1-1 call is made with several endpoints located at one ERL. The location of IP phones can be tracked both inside and outside of an organization. When a 9-1-1 call is placed, the enterprise call server routes the call with caller location to the Public Safety Answering Point. Rather than utilizing a trunk, this type of solution uses an organization's wide area network to deliver 9-1-1

calls. This service works with any type of phone that is included on the enterprise IP network including digital, analog, IP hardphone, softphone, and SIP phone. As users continue to become more nomadic within an organization, the E9-1-1 location management problem has at the same time become more urgent to address and more feasible to fix.

As we've done since our inception in 1997, 911 ETC continues to contend that there is a need for a national standard regarding E9-1-1 for MLTS. Among the states that have taken measures to enact legislation, the standards are across the board and compliance has been poorly enforced. State-by-state mandates lead to confusion for several of our large enterprise customers who have sites in multiple states. This issue is one of safety for America's citizens; the reality is that while citizens in one state may have the law on their side when attempting to receive emergency help while at their workplace or at school – others in a different state lack that same level of protection. For those organizations with sites in multiple states, the majority recognize that they must provide an equal level of safety for all of their people and implement the most stringent state rules in their operating area. If the expectancy is an equal level of protection across all 50 states, then a national set of standards is imperative for our nation's MLTS owners.

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