

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems)	CC Docket No. 94-102
)	
E911 Requirements for IP-Enabled Service Providers)	WC Docket No. 05-196
)	
Wireless E911 Location Accuracy Requirements)	PS Docket No. 07-114
)	
Framework for Next Generation 911 Deployment)	PS Docket No. 10-255

COMMENTS OF INTRADO INC.

Intrado Inc. (Intrado) respectfully submits the following comments in response to the Public Safety and Homeland Security Bureau’s request for comments on multi-line telephone systems (MLTS).¹

Intrado has long supported the implementation of more precise 9-1-1 location requirements for MLTS. Individuals in many businesses, schools and shared tenant locations remain at risk if first responders do not know where to find them in cases of emergency. The need is highlighted by the following information provided by Avaya Inc.:

- “60 million US employees who work or study in high-rise buildings, campus environments or sprawling corporate facilities are served by enterprise communications systems known as Multi-Line Telephone Systems (MLTS) or Private Branch Exchange (PBX).”²

¹ Public Safety and Homeland Security Bureau Seeks Comment on Multi-Line Telephone Systems Pursuant to the Next Generation Advancement Act of 2012, CC Docket No. 94-102; WC Docket No. 05-196; PS Docket Nos. 07-114 and 10-255, DA 12-798 (rel. May 21, 2012).

² Avaya Inc., Solving the Enterprise E9-1-1 Location Challenge, 1, www.avaya.com/usa/resource/assets/whitepapers/lb3982.pdf (last visited 7-1-12).

- “[O]n average 10-12% of calls received by 9-1-1 centers come from businesses and at least 80% of all businesses, government facilities and schools need some level of remediation to address their E9-1-1 readiness.”³

With traditional telephony, the 911 location is only associated with the physical trunk to a building, while callers needing assistance could be physically located anywhere within a multi-floor building or multi-building campus. With internet protocol (IP) technology, a caller provisioned through a business PBX may be physically located across town or in a different state.

Only 17 states have legislation addressing 911 calls from MLTS,⁴ and the requirements are not consistent among them. Federal guidance is necessary in order for there to be some uniform level of protection for individuals and consistent standards applicable to MLTS operators.

I. Feasibility of MLTS Manufacturers to Provide Precise 911 Location Information

MLTS are capable of providing more specific location information to public safety answering points (PSAPs) and thereby increasing the ability of first responders to provide life-saving assistance. In April, 2010, the California Public Utilities Commission (CPUC) initiated a rulemaking to Improve Public Safety by Determining Methods for Implementing Enhanced 9-1-1 for Business Customers and for Multi-line Telephone System Users.⁵ Workshops were held in July, 2010 with presentations by interested parties. The Final MLTS E9-1-1 Workshop Report, prepared by Commission staff, summarized the comments of participants on three main issues, including the “feasibility

³ *Id.*

⁴ The count is eighteen, if New Hampshire, which has separate statutory provisions that can be interpreted as imposing MLTS location requirements, is included.

⁵ Order Instituting Rulemaking 10-04-011, California Public Utilities Commission, *available at*, http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/116400.pdf.

and cost to businesses and other property owners of provisioning caller location information needed by Public Safety Answering Points (PSAPs) and field responders.”⁶

The Report found that “MLTS equipment manufacturer Avaya and third party E-9-1-1 solution providers identified several trends that have made solutions more feasible for the MLTS owner/operator.”⁷ The Report summarized those trends as follows:

- For the last ten years, major equipment manufacturers have built E9-1-1 capabilities into new models and PBX upgrades. It is very rare to find a PBX in use that cannot be programmed to deliver the caller ID needed to retrieve caller location information.
- Lower cost ISDN PRI circuits are now more common, and expensive mileage-based CAMA trunks are no longer required.
- Third party MLTS E9-1-1 solutions are going down in cost and are available for under \$5000. Small business solutions can be as low as \$1250 for a one-time implementation fee and \$65 to \$100 per month in recurring fees.
- The VoIP MLTS/PBX platform natively provides improved support for 9-1-1 for multilocation customers, and automated solutions can discover and update phone locations as they change which greatly reduces the administrative burden and cost to the business owner of tracking Moves/Adds/Changes (MAC) in a VoIP installation.
- SIP Trunking is more available from Internet Telephony Service Providers (ITSP) permitting the smallest enterprise VoIP PBX system to send caller ID with the 9-1-1 call.⁸

In fact, E911 call routing and delivery service is available for IP PBXs in the same manner as that provided for residential voice over internet protocol (VoIP) 911 calls. Intrado and

⁶ California Public Utilities Commission Communications Division, Final MLTS E9-1-1 Workshop Report, In Rulemaking 10-04-011 to Improve Public Safety by Determining Methods for Implementing Enhanced 9-1-1 Services for Business Customers and for Multi-line Telephone System Users, 9 (October, 2010), *available at*, ftp.cpuc.ca.gov/Telco/MLTS_E-9-1-1_Workshop_Report.pdf.

⁷ *Id.* at 7.

⁸ *Id.*

other providers offer such VoIP E-911 services to enterprise customers today. Intrado's V9-1-1® for Enterprise solution enables VoIP emergency calls to be routed from private networks to the appropriate PSAP using the existing 9-1-1 selective router infrastructure.

II. NENA Model Legislation

Intrado supports the concepts inherent in NENA's proposed legislation as national requirements or best practices. Intrado is not aware of any true technical standards that need to be developed for the implementation of MLTS E9-1-1 location capabilities. If any technical standards are needed, they should be developed by ANSI accredited standards setting bodies.

Respectfully submitted,

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