



STATE OF TENNESSEE  
TENNESSEE EMERGENCY COMMUNICATIONS BOARD  
DEPARTMENT OF COMMERCE & INSURANCE  
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EXECUTIVE DIRECTOR

May 20, 2013

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Response to Non-Initialized Phone Problems; Docket No. 08-51

Dear Ms. Dortch:

Thousands of callers with life threatening emergencies are being forced to wait while 911 call takers deal with non-emergency calls – prank or accidental -- from cell phones no longer served by telecommunications carriers. Non-service initialized (“NSI”) phones found in dumps, stuffed away in drawers, or given to children to play with are diverting precious 911 resources away from helping folks facing life and death situations.

In 2008, Tennessee conducted a survey over a 3 month period and discovered that the problem was worse than we realized. Over 10,000 times in a 3 month period Tennessee dispatchers and call takers notified us that they received an NSI call.<sup>[1]</sup> Of those 10,000 NSI calls, 188 were valid emergencies. Less than 2% of the NSI calls were true emergencies.

Every time one of those 10,000 calls reached a 911 call center, the call could have prevented someone with a life and death emergency from getting through to 911. Additionally, if call takers obtain a location with an NSI call that is not a true emergency, responders will be dispatched to investigate, which ties up even more emergency resources.

In Shelby County, Tennessee one 911 call center reported received over 1100 calls from one NSI phone in a 16 day period. This is not an isolated incident. During our survey, over 4,000 or 40% of the 10,000 calls were from repeat callers. 62 made 10 or more calls during the survey period. One made 140 calls. One child made 84 calls in one night, which nearly immobilized the call center’s ability to receive actual emergency calls.

We have concluded that this continues to be one of the most critical operational issues facing 911 today.

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<sup>[1]</sup> This is likely significantly underreported, because of TN’s 95 counties only 40 participated in the survey, covering only approximately 54% of TN’s population.

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With kindest regards,

A handwritten signature in black ink, appearing to read "Lynn Questell". The signature is written in a cursive, flowing style.

Lynn Questell  
Executive Director

Cc: TECB

Brian Fontes, Chief Executive Officer, NENA  
Trey Forgety, Director of Government Affairs, NENA