

# NENA

## The 9-1-1 Association

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Ms. Marlene H. Dortch, *Secretary*  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

March 14<sup>th</sup>, 2014

Re: Technology Transition Docket Nos. 13-5, 12-353, 10-90, 10-51, 03-123, 13-97

Dear Ms. Dortch:

On January 30<sup>th</sup>, 2014, the Commission sought comment on a proposal for an ongoing data initiative specifically targeting 9-1-1 and NG9-1-1 system information as part of its efforts to facilitate the orderly transition of the PSTN to an all-IP basis. NENA: The 9-1-1 Association strongly supports the Commission's efforts to keep abreast of developments in this rapidly-changing space, and to ensure that the enduring value of public safety network uses, such as 9-1-1, are preserved for all consumers during this complex transition. To that end, NENA submits these brief comments in response to the Commission's proposal.

NENA has extensive experience serving as a collector, aggregator, and broker of 9-1-1 system data. For many years, NENA has tracked the deployment of 9-1-1, wireline E9-1-1, and Phase I & II wireless E9-1-1 as those capabilities have rolled-out across the nation. That experience extends to both the challenges that must be overcome to create and operate an effective data collection system, and the best practices required to ensure such a system's enduring value. With respect to the Commission's specific proposals, there are some general principles that NENA believes the Commission should bear in mind.

Collecting data of the type and quantity proposed by the Commission is extremely time-consuming, and, in some cases, extremely difficult. There are almost 3,200 county-level governments in the United States, many of which may not yet be familiar with the myriad technical terms applicable to NG9-1-1 systems. Additionally, many counties and even states do not have centrally-managed or coordinated points of collection for information of the type sought by the Commission. Thus the Commission may find it necessary to obtain data through direct, county-by-county contacts, rather than through a voluntary reporting regime. Even then, some counties or states may simply refuse, for sundry reasons both political and practical, to supply the requested information. Vendors can be of some help in this regard, given their increasingly-national footprints and strong ties to local communities, but they, too, can find it hard to get consistent data and to assign it to an appropriate and commonly-understood level-of-progress.

In order to overcome these challenges, NENA recommends that the Commission adopt two fundamental design principles for its ongoing initiative. First, the Commission should adopt clear and consistent terms and definitions for any NG9-1-1 system components it may

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wish to track. Second, the Commission should establish multiple data dimensions related to differing aspects of NG9-1-1 systems.

Consistent definition of terms is important because, despite a decade of development work and several years of deployment in the field, there still exists some contextual ambiguity as to the precise meaning of terms like “ESInet,” “NG9-1-1 Core Services,” and even “NG9-1-1 System.” For example, network-oriented individuals generally consider the term “ESInet” to refer specifically to a managed IP network used by public safety agencies, as distinct from the term “NG9-1-1 Core Services,” which they hold to refer to the hardware, functional entities, and databases accessible over an ESInet under the architecture described in NENA’s i3 Standard. By contrast, non-network-oriented individuals tend to use the catch-all term “NG9-1-1” to refer generically to *both* an ESInet and the Core Services that run over top of it. For its part, NENA’s view is that “NG9-1-1” should refer to the *entire* NG9-1-1 service system, including the ESInet, core services, databases, routing processes, and human operational processes involved in handling a request for assistance. To resolve this latent ambiguity and ensure consistency of data across jurisdictions, NENA therefore recommends that the Commission begin by deciding precisely which aspects of NG9-1-1 system deployment it wishes to track, and settling on clear and concise definitions for those aspects. In so doing, the Commission could derive significant benefit from reviewing the i3 Standard and its technical definitions for the terms above (and many others).<sup>1</sup> Use of standardized terms has the potential to greatly reduce the Commission’s burden in designing its data collection tool(s) and the public safety community’s burden in providing reports.

In order to ensure that the data collected by the Commission are valuable measures of the transition to NG9-1-1, NENA recommends that the Commission consider collecting data along four general dimensions: geography, system deployment type, system deployment progress, and access network type transition progress. Relevant geographic scopes for tracking purposes in the NG9-1-1 context could include state, region, and (transitionally) county. Relevant system deployment types could include on-premises, ESInet-hosted, and cloud-hosted. More specific elements in this group could include data on whether an agency or 9-1-1 authority has deployed NG9-1-1-based CAD, MIS, or logging/recording systems. System deployment progress steps could include planning started, planning completed, infrastructure deployment started, ESInet deployed, NG9-1-1 service testing completed, initial access network transition completed, multiple originating services accepted, and NG9-1-1 service offered to all standards-compliant originating services and access networks. Finally, relevant access network type transition elements could include initial wireless carrier transitioned, all wireless carriers transitioned, initial wireline carrier transitioned, all wireline carriers transitioned, etc.

Finally, NENA notes that at ¶193 of the Proposal the Commission seeks “to get a better sense of whether NG911 networks connect carriers via IP-based or TDM-based legacy network gateways and what services beyond voice (text, video, data) these deployments enable.

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<sup>1</sup> TSD 08-003, *Detailed Functional and Interface Standards for the NENA i3 Solution* (Jun. 2011) (available at: [www.nena.org/?page=standards](http://www.nena.org/?page=standards)).

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NENA notes that these two concepts are somewhat independent, in that IP connectivity between carriers and NG9-1-1 systems and enabling non-voice services over either an IP- or TDM-based connection are the subjects of differing standards provisions. As such NENA supports the collection of data on both subjects.

NENA looks forward to working with the Commission to implement an effective and comprehensive data collection regime for NG9-1-1 and to assisting PSAPs and 9-1-1 authorities in better informing the Commission on these important matters.

Sincerely,



Telford E. Forgety, III; "Trey"  
*Director of Government Affairs  
& Regulatory Counsel*