

NENA Policy Statement on the FCC VoIP and E9-1-1 Order

On Friday June 3, the Federal Communications Commission (Commission) released the detailed Order concerning Enhanced 9-1-1 (E9-1-1) requirements for Internet Protocol (IP)-enabled services. The National Emergency Number Association (NENA), the only international association solely focused on the delivery of 9-1-1 services, applauds the Order as a positive step towards greater cooperation and deployment of IP-related E9-1-1 services and planning.

NENA fully supports the intent of the order and is pleased that the Commission is addressing the issue in the early stages of the industry. The Commission's actions provide a solid foundation and a path forward from which we can build on this very important topic. There are clearly issues that need to be addressed and we look forward to working with all of the stakeholders, both public and private, to reach common sense solutions that satisfy the requirements of this Order while working towards a future path that meets established industry standards.

Cooperative efforts have already been made to develop full NENA Migratory (I2) and next generation NG9-1-1 (I3) solutions. These solutions provide an implementation solution within the present E9-1-1 system framework and a path towards a completely IP based NG9-1-1 system. It is our expectation that in the near future all VoIP providers will be implementing a full Migratory or NG9-1-1 system. We understand the limitations that VoIP companies and their E9-1-1 service providers may be faced with under a 120 day deadline. However, it must be recognized that any partial solutions implemented within the 120 day timeframe which do not comply with the above open industry standards must be considered as interim methods, and should move toward full compliance with standards in a timely fashion. We further believe that solutions that have already been deployed prior to this Order must also move toward full compliance with standards in a timely fashion.

Fixed and nomadic VoIP service often replaces previous wireline service and is equivalent in use to wireline service for E9-1-1 purposes. We agree with and emphasize the FCC's definition of Registered Location as the VoIP subscriber's 'physical location' and 'valid street address'. We interpret this to mean that the E9-1-1 service objective and criteria continues to be the actual, MSAG validated, initial location where the subscriber is establishing VoIP service – not a billing or other location if that differs from the literal service address.

While the FCC chose not to specify performance standards for timely update of Registered Location data, we emphasize the need for minimal data update processing cycle times in order to maximize the accuracy of subscriber location for use by PSAPs in accomplishing quick response to emergency calls made via VoIP services.

We discourage waivers or delays that don't offer a clear solution path moving forward. Any waiver requests need to be judged on their individual merits.

NENA expects that interim solutions with features most essential for subscriber safety and Public Safety Answering Point (PSAP) operational effectiveness will be chosen. NENA opposes quick-fix solutions that may be perceived as easier to accomplish if they do not effectively serve the consumer and PSAP community. We stand ready to assist in evaluation of these issues.

The NENA Migratory solution uses components of previous cellular wireless solution structures to support VoIP subscribers utilizing non-local area code numbers. Some areas have not yet implemented these components. We acknowledge the E9-1-1 systems and PSAP readiness issue in some areas, and we are making a concerted effort as the nation's leading 9-1-1 organization to address this issue, in support of both cellular wireless and VoIP needs. While PSAP readiness is a valid issue, there are currently

many PSAPs covering millions of citizens that are capable of supporting the Migratory solution today. Therefore, we must push forward with the most advanced solutions for those PSAPs that are capable.

This issue highlights the limitations faced by many in the PSAP community who lack the funding necessary to upgrade their systems to be able to handle basic IP based communications. We were pleased to be able to work with our partners and Congress to pass the ENHANCE 911 Act of 2004 authorizing up to \$250 million in grants for PSAP upgrades and continue to work towards the appropriation of these funds. This Order provides yet another example of the importance of securing these funds to provide the most modern 9-1-1 system that the public has come to expect.

NENA stands ready to support and assist in the establishment of content of consumer education material, warning statements and warning labeling as required in the FCC Order.

We anticipate that the NPRM process will result in support of forward looking, open architecture solutions and timeframes, and expect that NENA's Migratory and NG9-1-1 solutions will meet those needs.

NENA's position on deploying IP-related E9-1-1 services includes the following criteria:

- 9-1-1 service is mandatory for VoIP providers that enable customers to both receive calls from and terminate calls to the public switched telephone network (PSTN).
- Connecting 9-1-1 calls to local PSAPs via designated ten-digit emergency number for non-enhanced access is only a temporary expedient. These calls must not route to "administrative" numbers, only Public Safety authority designated telephone numbers which have an answering priority equal to 9-1-1.
- A coordinated national plan is needed to implement and serve the various solutions for IP access to E9-1-1 with stakeholder participation by the National Association of Regulatory and Utility Commissioners (NARUC), Public Switched Telephone Network service supporters, Independent Local Exchange Carriers, the Voice on the Net (VON) Coalition, NENA and other IP industry representatives.
- The National Program Office, as established by the ENHANCE 911 Act of 2004, must play a coordination role. This role is central to moving the nation to a more robust and flexible E9-1-1 system for future applications related to IP, next generation systems and beyond.
- Implementation strategies must recognize short-term solutions are temporary and, therefore, require separate project management functions. Short-term, "stop-gap" solutions should not be an obstacle to progress to a more comprehensive long-term solution that allows for the full integration of IP services into the 9-1-1 system.

NENA believes that all IP and next generation technologies can and must aggressively pursue implementing E9-1-1 in the interest of their consumer's safety and security. Furthermore, 9-1-1 is vital to the personal safety of IP service customers, and security of all consumers, the general public and our nation's homeland security. Providing our citizens with easy and reliable access to police, fire and paramedic services through an E9-1-1 system is a guiding principal of NENA.

NENA looks forward to actively working with all parties to address and meet the challenges of IP and 9-1-1, as well as other emerging telecommunications technologies and capabilities.