Position Paper

Internet Protocol, Voice over Internet Protocol and E9-1-1

As innovative and new ways to call 9-1-1 have emerged, so too have calls for us to explore and examine efficient uses of 9-1-1 services. In this call for action, we recognize that technologies such as Internet Protocol (IP) and Voice over Internet Protocol (VoIP) are dynamic, competitive, innovative, and most of all, an opportunity to improve our nation's 9-1-1 system.

In its Notice of Proposed Rulemaking on "IP-Enabled Services," FCC 04-28, released March 10, 2004, the Federal Communications Commission ("FCC") states that the emergence of IP "has significant implications for meeting the nation's critical infrastructure and 911 communications needs." The Notice refers (¶56) to NENA's agreement with the Voice on the Net ("VON") Coalition and asks "to what extent can voluntary consensus, rather than regulation, spur the deployment of IP-enabled E911 services?"

The National Emergency Number Association (NENA) supports the need for establishing a national public policy, technical and operational blueprint and framework for the advancement of Internet based service offerings for 9-1-1.

Over 50 million Americans are using some form of broadband Internet access. While Internet-based services continue to grow in number and diversity, Internet-applications for the transmission of voice communications demonstrates a digital migration and challenge for the 9-1-1 community.

As the public reaches for faster, more affordable information transfer and communication, our nation's 9-1-1 system and local emergency response networks need 21st Century communications capabilities. From the inception of new technology, to the detail and complexity of public policy, the safety and security of the public must be of paramount importance. We support leadership, dedication and determination to ensure 9-1-1 capabilities from any device, anywhere at anytime.

NENA supports a vision, and position of collaboration, to explore what must be done to ensure our nation's 9-1-1 system is not only part of the "digital revolution", but a priority in providing any internet-based voice service and application.

NENA further recognizes that this is a monumental challenge that requires milestones and hard deadlines, but also thorough and thoughtful review of progress and changes in the evolution of technology. To this end, NENA is adopting principles to support an aggressive, open consultative process to improve planning, leadership and innovativeness in the delivery of a fully functional E9-1-1 system for VoIP and internet-based voice communications.

NENA's Six IP Services and Applications Principles for 9-1-1:

1. Support National E9-1-1 VoIP Policy Plan

We support the creation of a national E9-1-1 VoIP policy plan and strategy for PSAPs, providers and policymakers.

E9-1-1 is a national imperative. Knowing a caller's location is critical to emergency response. And in the current reality of heightened emergency risks and alertness, a national plan is needed to ensure the most effective and efficient methods and procedures are being used.

NENA and members of the Voice over Internet Protocol (VoIP) industry have forged an early agreement on Voice over Internet applications in providing emergency 9-1-1 service.

This agreement is an important first step in developing a broader national E9-1-1 VoIP Policy Plan.

We note in our principles, that VoIP is a global issue, and emergency applications needs to be coordinated, consistent with international standards and multiple dialing codes.

2. Encourage Vendor and Technology Neutral Solutions and Innovation

The emergence of internet technology based communications services as a means to transmit data and voice will have long reaching implications for our nation's 9-1-1 system. Consistent with the policy goals enacted in the Wireless Public Safety Act of 1999, enhanced 9-1-1 is an essential part of modernizing emergency communications to support state-of-the-art, interoperable, integrated and efficient emergency communications and information infrastructure for all emergency responders.

We believe E9-1-1 access by IP-based services should be vendor - and technology-neutral, providing PSAPs with consistent data elements and consumers with appropriate access points to the 9-1-1 system consistent with international standards.

3. Retain Consumer Service Quality Expectations

The role of the call taker and 9-1-1 comes with assumed consumer service quality expectations. PSAP call takers are the gateway to police, fire, and paramedic first responders; the call taker is the first link in the emergency chain, often the only contact with the victim or others directly involved in the emergency situation. As the global consumer changes communications capabilities, the 9-1-1 system should be dynamic in design and operational assumptions, flexible to adjust to new technologies and old expectations.

4. Support Dynamic, Flexible, Open Architecture System Design Process for 9-1-1

NENA's objectives are to verify the assumption that IP protocol and technology is the appropriate basis for NENA's Future Path Plan ("FPP") toward a forward-looking E9-1-1 service. The FPP effort began over two years ago: *http://www.nena.org/9-1-1TechStandards/future_path_plan.htm.* Collaborating with IP experts, NENA will continue to explore concepts for a programmatic definition, which can then serve as the target for open architecture system designs.

NENA supports future E9-1-1 design that will take all known E9-1-1 feature needs into account, as well as new issues and capabilities that will inevitably emerge in coming years, allowing for design and operational assumptions to be checked and verified as part of any solution development and implementation.

5. Develop Policies for 9-1-1 Compatible with the Commercial Environment for IP Communications

We seek policies and regulations that are compatible with commercial offerings for IP, designed to enhance the convenience and service options available to consumers, private industry and others in calling 9-1-1.

Our fundamental principle concerns the safety of millions of Americans who may use IP based service in emergency situations. We find it important to understand first what is possible and appropriate in providing IP based E9-1-1 services before pursuing broad based policy measures that may prove to be limiting, as technology and economies change over the course of time.

In this process, we will develop a number of consumer education projects involving various industry participants and NENA's public education committee to create suggested materials so that consumers are fully aware of 9-1-1 capabilities and issues.

6. Promote a Fully Funded 9-1-1 System

Funding our nation's 9-1-1 system is a top priority for providing reliable service as well as the safety and security of our nation. Enabling our nation's PSAPs to receive VoIP E9-1-1 information requires an administrative approach to maintain adequate funding. Likewise, resources and funding mechanisms are needed for adequate state and local PSAP and 9-1-1 personnel operations and costs.

Deployment, implementation, recurring costs and resources should be evaluated and addressed in a National E9-1-1 VoIP Policy Plan.

A not-for-profit corporation, the National Emergency Number Association (NENA) is the only organization dedicated solely to the study, advancement, and implementation of 9-1-1 as America's universal emergency number. For more information, visit www.nena9-1-1.org