

**STATEMENT OF  
NATIONAL EMERGENCY NUMBER ASSOCIATION  
(NENA)**

**BEFORE THE  
UNITED STATES HOUSE OF REPRESENTATIVES  
COMMITTEE ON ENERGY AND COMMERCE  
SUBCOMMITTEE ON TELECOMMUNICATIONS AND THE INTERNET**

**“Voice over Internet Protocol and Enhanced 9-1-1”**

**July 7, 2004**

In the last 15 years modern communications services advancements have put a spotlight on the need for a more appropriate E9-1-1 system. Specifically, a 9-1-1 system that is able to adapt rapidly to new technology and the resulting new devices supporting communications.

Today, over 50 million Americans are using some form of broadband services. A growing number of that subset is migrating to Voice over Internet Protocol (VoIP), for competitive voice telephony. Truly we are at the dawn of a new era, in which voice, data and computer integration are converging to offer consumers, commerce and others new communications choices in our digital age.

Yet with all the excitement for VoIP comes concern. If the past is any indication, public safety services and access may be overlooked unless we pursue early technical review and service planning.

Since its inception, the 9-1-1 system has been THE first responder in times of individual and mass emergencies. Every day, Americans call 9-1-1 at the time of their greatest need. For the caller and the public, the successful completion of a 9-1-1 call can mean the difference between danger and security, injury and recovery, or life and death. Simply, the ability to call for help in times of an emergency is not ‘voluntary’ – it’s mandatory.

In regards to Voice over Internet Protocol, NENA respectfully offers the following recommendations to improve the public policy leadership for 9-1-1 and Voice over Internet Protocol planning with our nation’s emergency communications.

Guiding NENA leadership is our adopted technical, operational and policy “Future Path Plan” by which new services, technologies and devices capable of dialing or signaling 9-1-1 can and should be able to provide their users with access to emergency assistance.

For well over two years, we have used the “Future Path Plan” to convene stakeholders discuss solutions and form interim/transitional and long-term solutions to define full requirements for our nation’s 9-1-1 system.

As the United States Congress, grapples with Voice over Internet Public Policy issues, NENA offers the following observations and actions for consideration and review of nation’s communications system.

### **National Plan for 9-1-1 and VoIP Policy**

We need a national 9-1-1 VoIP policy. We recognize that to be effective and meaningful the 9-1-1 system must work with a wide range of VoIP and IP-enabled products and services. VoIP technologies, and those well into the future, will need 9-1-1 orientation and long-term solutions to accommodate all the variances. It’s about building solutions.

### **Consumer Expectations**

9-1-1 is national, consumers are increasingly global. We must retain consumer service quality expectations. Technical development of 9-1-1 must be convergent with its policy direction. 9-1-1 needs to be treated as an integrated public safety service, part of a larger whole for our safety and national security. In over 35 years of 9-1-1 service, we’ve learned some important and valuable lessons in implementing new technologies: 9-1-1 must be treated as an inter-dependent overall system; coordination is very important; federal leadership is necessary for national implementation and resolution of issues.

### **Open Systems and Open Standards**

We as a nation must develop policies for 9-1-1 compatible with the commercial environment for IP communications. We cannot support the further fragmentation of 9-1-1. We recognize that consumer expectations for 9-1-1 are national and therefore require jurisdictional leadership and resources from the Federal Government. We have called for a national coordinating office as offered by recent legislation in the House of Representatives HR. 2898 and United States Senate (S. 1250).

### **Regulatory Leadership and Support**

Finally, we support the need for targeted federal regulation for 9-1-1 and VoIP, believing further that this is most appropriately handled by the FCC, through our present collaborative approach. With our support, we look to the Commission to maintain a directive influence in the needed processes for industry and public safety collaboration.

We seek a ‘light touch’ regulatory approach for 9-1-1 that enables full 9-1-1 capabilities for the consumer while minimally affecting, and actually improving the advancement of overall consumer services. In our experience, voluntary consensus provides better, more

accurate results. Improved 9-1-1 project management is better than legal debate. Real 9-1-1 solutions are better than arbitrary requirements.

In August, 2003 we began aggressive IP development efforts. The NENA – VON Coalition agreement is a result of those efforts, and is an important first step toward consensus development; to both guide the initial efforts of Voice over Internet providers in handling 9-1-1 calls, and to gain agreement in an active role in the development of migratory and longer term IP and VoIP solutions for 9-1-1. Our schedule for completion of technical and operational elements of this agreement is before the end of First Quarter 2005. And in our consensus, we strongly believe that customer disclaimers do little to support the public's safety.

To this end the nation's 9-1-1 system needs reliable and dependable funding. In the VoIP environment, funding could prove evermore complicated, given the traditional policy framework reliance on state and local funding for 9-1-1 services and upgrades. Until a clear solution is identified for this immediate public safety funding problem, attention to the need for technological change and evolution of the E9-1-1 system itself is difficult to achieve.

9-1-1 service should not be an 'afterthought' for communications providers, but rather an active part of service design and development.

As the consumer changes communications capabilities, the 9-1-1 system should be dynamic in design and operation to adjust to and match new technologies and old expectations.

We thank the Subcommittee for allowing us to share our concerns and leadership in improving our nation's 9-1-1 system.

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