

National Emergency Number Association  
*The Voice of 9-1-1*



Mr. Thomas Navin  
Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Docket 05-196, ex parte communication  
pursuant to Section 1.1206 of the Rules

Dear Mr. Navin,

The National Emergency Number Association (“NENA”) recommends that the Commission take immediate steps to establish an interim, followed by a permanent, national administration function for E9-1-1 routing control codes for VoIP E9-1-1 and, secondly, wireless E9-1-1 services. The accomplishment of the Commission’s recent VoIP E9-1-1 Order will be furthered by resolving the roadblock represented by the current lack of a national Routing Number Administrator (RNA).

Ten digit non-dialable numbers from the NPA-511-XXXX and NPA-211-XXXX number sets<sup>1</sup> have been utilized for several years to support wireless E9-1-1 service needs for Emergency Service Routing Keys (ESRKs) and Emergency Service Routing Digits (ESRDs), with the knowledge of INC and NANC. These number sets are not used as telephone numbers, but rather data codes to control the routing of E9-1-1 calls in wireless applications. The general terminology is pseudo Automatic Number Identification (pANI), required due to the mobile nature of wireless 9-1-1 callers, and the interface of wireless calls into the E9-1-1 systems. After initial attempts to identify a national management point, several of the E9-1-1 system service provider ILECS have taken on the pANI management function in their areas, in order to bring managed order to the distribution and use of pANIs by wireless carriers and their vendors. Currently, for wireless, these involve diverse mechanisms in place across the country which either utilize the mentioned non-dialable pANIs, or dialable pANIs taken from existing wireless provider numbering resources or from E9-1-1 system service provider ILEC numbering resources.

The immediate need for further use of non-dialable pANIs is to support VoIP E9-1-1, as similar technical conditions in interfacing these callers to E9-1-1 are involved. The term Emergency Service Query Key (ESQK) is used in the VoIP application, to allow clear reference and differentiation from wireless uses. Both the 511 and 211 code sets have been reserved for E9-1-1 routing code use by INC.

VoIP service providers have neither direct number assigning authorization, nor the ability to readily acquire numbers for 9-1-1 calling routing control purposes on a national scale.

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<sup>1</sup> Central Office Code (NXX) Assignment Guidelines (COCAG) Section 4.6, Footnote 37

This generates a roadblock in accomplishing the FCC's recent VoIP E9-1-1 Order, as the use of routing codes is critical for nomadic and non-local NPA subscribers in E9-1-1 service. NENA's pending Migratory solution (I2) standard for VoIP service interface to the current E9-1-1 systems assumes and depends upon the use of ESQKs.

Both for current VoIP needs, and as an improvement for the wireless arena, NENA believes that a national Routing Number Administrator (RNA) is critical. The instant need is obviously for VoIP E9-1-1 applications, in order to support and move forward in accomplishing the FCC VoIP E9-1-1 Order objectives. A single point, with neutrality characteristics and experienced in numbering data management is desirable, in order to minimize start up time and bring effectiveness to this national function in support of E9-1-1 service needs.

The North American Numbering Council (NANC) pANI Issues Management Group (IMG) is currently working on establishing recommended interim administration guidelines for VoIP-related pANIs. NENA is active in and supports that endeavor.

NENA believes that either the PA or NANPA is the best location for this nationally critical function, and recommends and requests that the FCC take the quickest possible action to enable this recommendation.

Please direct any questions to the undersigned.

Sincerely,

Roger Hixson  
Technical Issues Director

cc: Michele Carey, Jessica Rosenworcel, Scott Bergmann, Russ Hanser