Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementing Kari's Law and Section 506 of RAY BAUM'S Act	)	PS Docket No. 18-261
	)	
	)	
Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems	)	PS Docket No. 17-239
	)	

COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Notice of Proposed Rulemaking* (*NPRM*) released September 26, 2018, in the above-referenced dockets. The *NPRM* seeks comment on the Federal Communications Commission's (Commission) proposal to require dispatchable location for multi-line telephone systems (MTLS). As the leading developer of location accuracy technical standards, ATIS is pleased to have the opportunity to respond to the *NPRM*.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS' diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless and wireline service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service

providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the Long Term Evolution (LTE) and LTE-Advanced wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

The Emergency Location Task Force (ELOC TF) is composed of members of ATIS' Wireless Technologies and Systems Committee (WTSC) and Emergency Services Interconnection Forum (ESIF). It was established to focus on the North American specific aspects for improving emergency location capabilities and services such as location accuracy and operating environments. The ELOC TF is also developing the standards and requirements needed to implement the Nationwide Emergency Address Database (NEAD).[1] ATIS ELOC, ESIF and WTSC produce many of the technical specifications related to location accuracy and 911 used by U.S. service and equipment providers; however, ATIS does not currently develop MLTS standards.

II. COMMENTS

In the *NPRM*, the Commission seeks comment on whether it should require validation for dispatchable location information associated with MLTS 911 calls.[2] The FCC notes that the mobile E911 definition of "dispatchable location" requires that, when delivering dispatchable location, the street address of the calling party must be validated and, to the extent possible, corroborated against other location information prior to delivery, and asks if there is any reason

[1] ATIS serves as the official Program Manager for the NEAD LLC to ensure the successful launch of the database, which will identify and utilize the location of Bluetooth beacons and Wi-Fi access points to help identify an emergency caller's location.
[2] *NPRM* at ¶57.

why street address validation would be more difficult for MLTS.[3] ATIS ELOC notes that, while corroboration, where feasible, is an important part of validating dispatchable location information, there are complexities and costs associated with the validation of street addresses for MLTS, particularly in multi building environments. Deploying equipment to validate and maintain the accuracy of dispatchable locations for MLTS on large commercial campuses would be cost prohibitive to enterprise owner/operators. Moreover, when other location data is available, integrating this information into existing source(s) to identify the most accurate data will create additional complexities potentially on PSAPs, operators, and/or the enterprise. Additional study into the scope of this impact is necessary before the Commission considers rules pertaining to the integration of MLTS location to the PSAP. Validation for enterprise locations below the building level will have to await the availability of location validation functions (LVFs) in local NG9-1-1 systems.

The Commission also seeks comment on whether it should allow and encourage potential alternatives to dispatchable location, such as x/y/z coordinates.[4] ATIS ELOC notes that x/y/z coordinates may be beneficial as a supplement or alternative to dispatchable location in certain contexts. ATIS ELOC also believes that other alternatives to dispatchable location may emerge. ATIS ELOC therefore supports the Commission's proposal to allow the industry to use alternatives to dispatchable location, noting that such flexibility facilitates innovation and interoperability. For example, mapping software used by PSAPs and field responders will necessarily exchange information in geodetic form; critical information like uncertainty or "search area" could be lost if information must be transformed from geodetic to civic or vice versa.

[3] *Id.*
[4] *NPRM* at ¶64.

The possible use of the NEAD to assist MLTS managers and operators in determining the dispatchable location of MLTS end users is also discussed in the *NPRM*.[5] While ATIS ELOC believes that the NEAD can assist in determining dispatchable location, it would not necessarily be useful to wireline systems, which have other mechanisms to determine location. ATIS ELOC believes that the NEAD could potentially assist with dispatchable location for future implementations like voice over Wi-Fi (depending on device availability/implementation). Currently, however, there are no existing standards for voice over Wi-Fi for NEAD.

Finally, ATIS ELOC notes that Commission also proposes in the *NPRM* to amend its rules to require providers of fixed telephony services to provide dispatchable location with 911 calls.[6] The Commission explains that including fixed telephony carriers in its consideration of dispatchable location requirements is consistent with the "all platforms" approach sought by Congress in the RAY BAUM'S Act.[7] While ATIS ELOC understands and supports the goal of providing accurate location information for 911 calls, it is concerned that this "all platforms" approach could result in overly prescriptive regulations that inhibit innovation.

[5] *NPRM* at ¶65.
[6] *NPRM* at ¶67.
[7] *Id. RAY BAUM'S Act of 2018,* Sec. 506 directs the Commission to consider adopting rules to ensure that the dispatchable location is conveyed with a 9–1–1 call, regardless of the technological platform used and including with calls from multi-line telephone systems.

III. CONCLUSION

ATIS appreciates the opportunity to provide its comments on the *NPRM* and urges the Commission to consider the input above.

Respectfully submitted,

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