

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Framework for Next Generation 911)	PS Docket No. 10-255
Deployment)	
)	
)	

**REPLY COMMENTS OF
THE ALLIANCE OF TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (“ATIS”) hereby submits these reply comments in response to the Federal Communications Commission’s (Commission) *Notice of Inquiry (NOI)* in the above-referenced docket.¹ ATIS files these reply comments to emphasize a point made by ATIS and other commenters – that NG9-1-1 systems cannot be fully deployed until additional technical work is completed. The public safety and communications industries have done a tremendous job in developing technical standards and specifications, but there is additional work that is needed before NG9-1-1 can become a reality.

ATIS notes that NG9-1-1 is not a single technology or a single standard – it is an ecosystem that must be developed with the collaboration of many stakeholders, including public safety agencies, communications service providers and technology companies. It is vitally important that technical standards be developed that describe the architecture, functionality and interconnection of all parts of this ecosystem. These standards must be

¹ *Framework for Next Generation 911 Deployment*, Notice of Inquiry, PS Docket No. 10-255, FCC 10-200 (rel. Dec. 21, 2010) (“*NOI*”).

in place before it is possible to migrate away from the legacy 911 transport technologies to NG9-1-1 systems.

Numerous commenters, including ATIS, have noted that many of the technical standards necessary to deploy this new ecosystem are currently in development.² Intrado, for instance, notes that NG9-1-1 standards development is a “work in progress” and recognizes that “developing standards for an entirely new system, such as an end-to-end NG9-1-1 system, is a massive and lengthy undertaking...”³ The Voice on the Net Coalition observes that “significant technical and operational work by industry experts is needed to resolve complex information technology issues.”⁴ Sprint similarly notes that “significant work must take place before the standards that are integral to NG911 deployment are finalized.” CTIA – The Wireless Association[®] acknowledges that “[w]hile NG911 standards development processes are moving into the advanced stages...significant technical challenges remained to be addressed before the regulations are adopted.”⁵

ATIS is proud of the progress that it has made in the development of technical standards that will help to permit the development of NG9-1-1 service. ATIS believes that the application of its open, equitable and consensus-based processes has created standards that are technically sound, appropriately consistent with international technical specifications and that accommodate the future converged telecommunications network.⁶

² See Comments of the Alliance for Telecommunications Industry Solutions at pp. 2.

³ Comments of Intrado Inc. and Intrado Communications Inc. at p. 1.

⁴ Comments of the Voice on the Net Coalition at p. 3.

⁵ Comments of CTIA – The Wireless Association at p.3.

⁶ ATIS is a founding and sole North American Organizational Partner of 3rd Generation Partnership Project (3GPP), a collaboration between key telecommunications associations to make globally applicable technical specifications for a 3rd Generation (3G) Mobile System that is developing relevant technical specifications.

Some of this technical work was described more fully in ATIS' comments in response to the Commission's *Further Notice of Proposed Rulemaking* and *Notice of Inquiry* pertaining to E9-1-1 location accuracy requirements.⁷ However, another important NG9-1-1 project is currently underway at ATIS that should be mentioned.

Working collaboratively, ATIS' Wireless Technologies and Systems Committee (WTSC), Emergency Services Interconnection Forum (ESIF), Packet Technologies and Systems Committee (PTSC) and Next Generation Interconnection Interoperability Forum (NGIIF) are developing a standard that will address an essential aspect of NG9-1-1 – how an Emergency Services IP Network (ESInet) can interface with communications providers that are using the 3GPP common IP Multimedia Subsystem (IMS) architectural framework for delivering Internet Protocol (IP) multimedia services. As most telecommunications carriers plan to use this framework, the aspect of NG9-1-1 is essential to future interoperability.

This standard will describe North American emergency call handling procedures in an IMS-based origination network and the routing of such calls to a terminating National Emergency Number Association (NENA) i3/NG9-1-1 ESInet or to a legacy selective router. The standard will also: (1) describe the interface between the IMS originating network and the ESInet, and between the IMS originating network and a legacy selective router; and (2) identify, and adapt as necessary, the common IMS emergency procedures for applicability in North America to support emergency communications originating from an IMS subscriber (fixed, nomadic, or mobile) and

⁷ See Comments of Alliance for Telecommunications Industry Solutions p. 6, filed January 19, 2011, in response to *Further Notice of Proposed Rulemaking* and *Notice of Inquiry*, PS Docket No. No. 07-114, WC Docket No. 05-196, FCC 10-177 (rel. Sept. 23, 2010).


delivering to a NENA i3/NG9-1-1 ESIInet or to a legacy selective router. While the main focus of this standard is IMS emergency service origination and in particular the associated impacts to an originating device and originating IMS network, the standard will address related support from the access network and for location acquisition, subscriber home networks in the case of roaming, and considers support for service origination (e.g., call back) from a PSAP.

Finally, ATIS notes that progress is also being made by others in developing NG9-1-1 specifications, but that additional work is also needed on these specifications. NENA is currently developing its i3 specification, *Detailed Functional and Interface Specification for the NENA i3 Solution – Stage 3*. While additional work remains before this specification can be used to permit implementers to build NG9-1-1 systems, ATIS looks forward to collaborating with NENA on this issue and the development of future versions of this specification.

Conclusion

ATIS supports the development of NG9-1-1 and looks forward to collaborating with other architects of this ecosystem to ensure that such a system is based on open, equitable and consensus-based specifications that are technically sound and appropriately consistent with international technical specifications, and that accommodate the future converged telecommunications network.

Respectfully submitted,



Thomas Goode
General Counsel
Alliance for Telecommunications Industry
Solutions
1200 G Street, NW
Suite 500
Washington, DC 20005
(202) 628-6380

March 14, 2011