

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

In the Matter of	)	
	)	
Revision of the Commission's Rules to	)	
Ensure Compatibility With Enhanced 911	)	CC Docket No. 94-102
Emergency Calling Systems	)	
	)	
E911 Requirements for IP-Enabled Service	)	WC Docket No. 05-196
Providers	)	
	)	
Wireless E911 Location Accuracy	)	PS Docket No. 07-114
Requirements	)	
	)	
Framework for Next Generation 9-1-1	)	PS Docket No. 10-255
Deployment	)	
	)	
	)	

**COMMENTS OF THE  
ADMINISTRATIVE COUNCIL FOR TERMINAL ATTACHMENTS**

The Administrative Council for Terminal Attachments (ACTA) submits these comments in response to the May 21, 2012, *Public Notice* released by the Federal Communications Commission's (Commission) Public Safety and Homeland Security Bureau (PSHSB) in the above-referenced dockets. In this *Public Notice*, the PSHSB seeks comment on the feasibility of Multi-Line Telephone Systems (MLTS) to provide the precise location of a 911 caller and on the National Emergency Number Association's "Technical Requirements Document on Model Legislation E911 for Multi-Line Telephone Systems." The ACTA appreciates the opportunity to provide input on this *Public Notice* based on ACTA's significant experience with technical issues related to the attachment of terminal equipment to the public switched telephone (PSTN) and with Part 68 of the Commission's rules.

In the *Public Notice*, the PSHSB specifically requests input on whether the Commission should modify its Part 68 rules to include E911 requirements for MLTS. The ACTA notes that, for the past twelve years it has been the entity responsible for significant administrative portions of Part 68 rules governing the connection of customer premises equipment to the public switched telephone network and certain private-line services.<sup>1</sup> In this role, the ACTA is responsible for: (1) adopting technical criteria and acting as the clearing-house for the publication of technical criteria for terminal equipment developed by ANSI-accredited standards development organizations; and (2) establishing and maintaining a registration database of equipment approved as compliant with the technical criteria. The Commission retained sole responsibility for enforcement of the Part 68 regulations and compliance with the privatized functions.

The ACTA fulfills its mission through an open and consensus-based process and with active participation from key stakeholders, including service providers, manufacturers, testing laboratories and other interested parties. Subject matter experts from industry stakeholders actively engage within the ACTA on key issues, including the education of manufacturers and others in the industry on the terminal equipment registration requirements, the evaluation of technical issues related to the plug and jack compliance with the Commission's Part 68 rules and the need for enhanced enforcement of the Commission's rules to protect the public's access to emergency services, and ensure continued adherence to hearing aid compatibility regulations.<sup>2</sup>

While the ACTA expresses no opinion regarding the benefit of modifying the Part 68 rules to include new E911 requirements for MLTS, it notes that any new Part 68 obligations may

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<sup>1</sup> In the Matter of 2000 Biennial Review of Part 68 of the Commission's Rules and Regulations, *Report and Order*, CC Docket No. 99-216 (released Dec. 21, 2000). In that *Report and Order*, the Commission directed the telecommunications industry, through the co-sponsorship and support of the Alliance for Telecommunications Industry Solutions (ATIS) and Telecommunications Industry Association (TIA), to establish the ACTA, an open body that would assume the role previously performed by the Commission.

<sup>2</sup> The ACTA holds quarterly meetings that are open to all interested parties. More information about the ACTA can be found on the ACTA website at: [www.part68.org](http://www.part68.org).

not be effective if they are not accompanied by enhanced enforcement of these rules. As the ACTA has noted previously in other contexts, enforcement of Part 68 will serve to ensure that these rules will continue to protect the PSTN from harms caused by the connection of terminal equipment and associated wiring and ensure the effective availability of this vital resource by all consumers.<sup>3</sup>

Finally, to the extent that the Commission does seek to modify its Part 68 rules, the ACTA recommends that the Commission take the opportunity to protect the PSTN by clarifying that all devices, including VoIP, that connect or potentially can connect to the PSTN, and private line services provided over wireline facilities that are owned by providers of wireline telecommunications, must be compliant with Part 68 rules and the ACTA-adopted technical criteria, and must be listed in the ACTA's Part 68 database of approved terminal equipment.

The ACTA appreciates the opportunity to provide this input and would welcome the chance to provide further input regarding the impact that changes to the Commission's Part 68 rules may have on the responsibilities of the ACTA, the reliability of the PSTN and/or the availability of consumers to use telephone terminal equipment to access emergency services.

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<sup>3</sup> See Comments of the ACTA April 13, 2011, in response to the March 3, 2011 *Notice of Proposed Rulemaking* in CG Docket No. 10-213, WT Docket No. 96-198 and CG Docket No. 10-145.

Respectfully submitted

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