

**Testimony of
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**To the
Communications Subcommittee of the
US Senate Committee on Commerce, Science and Transportation**

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Mr. Chairman and distinguished members of the Communications Subcommittee, as president and CEO of the Alliance for Telecommunications Industry Solutions (ATIS), I want to thank you for the opportunity to submit testimony regarding Enhanced 911 (E-911) service for wireless phones. As you know, accelerating the deployment of this life saving technology is of vital importance, and it is a priority of ATIS to continue to coordinate efforts between the public safety community and the communications industry.

ATIS is a membership organization of communications companies active in the development of technical and operational standards that support the interconnection and interoperability of communications networks and systems. Over 1,400 communications industry professionals from more than 400 companies participate in ATIS' 16 industry standards committees and forums. Standards developed through ATIS make it possible for wireless and wireline service providers, manufacturers, software companies, and other industry interests to successfully roll out new products and services to consumers. It is particularly important, for industry companies and consumers, to successfully resolve technical and operational issues through industry-based standards that support interconnection of networks and services between multiple carriers and different brands of network equipment. ATIS standards provide the communications industry with solutions for seamless voice and data services, and for next generation networks fueled in part by the Internet.

In May of 2002, ATIS, in conjunction with the National Emergency Number Association (NENA), established the Emergency Services Interconnection Forum (ESIF) to facilitate the identification and resolution of technical issues related to the interconnection of the telephony and emergency services networks. To date, the ESIF has introduced, discussed and validated more than 20 critical technical and operational issues surrounding the importance of E-911.

ESIF's "Wireless E-911 Phase II Readiness Package"

In February 2003, the ESIF released the "Wireless E-911 Phase II Readiness Package," in an effort to assist Public Safety Answering Points (PSAPs) with the establishment of the service that allows PSAPs to pinpoint a wireless caller's location. Before wireless E-911

Phase II is implemented in an area, a PSAP must demonstrate to a wireless carrier that it is ready to receive wireless E-911 calls.

The ESIF Readiness Package is a standard evaluation method for PSAPs to utilize in determining and documenting their status for wireless carriers from whom they request Phase II implementation. The Readiness Package is available on the ATIS (www.atis.org) and NENA (www.nena.org) web sites, and it is attached for your information.

The Readiness Package is consistent with the Federal Communications Commission's (FCC) requirements for Phase II deployment, and PSAPs should feel confident when utilizing ESIF's Readiness Package. This is a valuable tool for PSAPs, and helps to eliminate implementation roadblocks in deploying wireless E-911.

By completing the checklist included in the Readiness Package, PSAPs document their readiness, and are then able to determine the necessary next steps in deploying wireless E-911 service. The FCC requires that a wireless carrier must implement E-911 within the six-month period following the date of the PSAP's valid request. Industry companies and organizations that developed the Readiness Package include representatives of wireless carriers, 911 service system providers, NENA and the Association of Public Safety Communications Officials (APCO). The ESIF is conducting a public awareness campaign to alert PSAPs on the availability of the Readiness Package.

911-Only and Non-Service Initialized Wireless Phones

Of additional importance is the ESIF proposal involving 911-only and donated wireless phones that are not associated with a wireless service plan, or "non-service initialized" phones. Last year, the FCC granted a Request for Stay filed by ATIS on behalf of the ESIF, regarding the FCC's Report and Order (94-102), which designated October 1, 2002, as the effective date for the implementation of the consecutive number code "123-456-7890" as the call-back number for 911-only and non-service initialized phones. This consecutive number approach would not provide PSAPs with a unique call-back number when 911 calls are dialed from 911-only and non-service initialized phones.

For example, if the "123-456-7890" approach is utilized, the PSAP will only be aware that an emergency call has been placed from a 911-only or non-service initialized phone, and will not have the opportunity to return the call if it is dropped or terminated by the caller.

In light of these circumstances, ATIS requested that the FCC revisit issues surrounding 911-only and non-service initialized wireless phones, and recommended a potential solution found in an industry standard, "Enhanced Wireless 9-1-1 Phase 2," jointly developed and published by ATIS' Standards Committee T1 and the Telecommunications Industry Association's (TIA) engineering committee, TR 45.

The standard proposes the use of 911 followed by part of a wireless handset's Electronic Serial Number (ESN) or International Mobile Station Equipment Identity (IMEI) to create a surrogate telephone number associated with a 911-only or non-service initialized wireless phone. The use of this standard could enable PSAP operators to identify 911-only and non-initialized wireless phones used to place emergency calls, and allow PSAP operators to call back an individual possessing a 911-only or non-service initialized wireless phone.

Recently, FCC Commissioner Martin stated in *Communications Daily* that he was hopeful the FCC would be able to act soon on ESIF's proposal and believes the "ESIF proposal makes a lot of sense." In addition, Commissioner Martin noted the ESIF plan "would thus help prevent the misuse of the 911 system by identifying the source of harassing calls and make clear when a legitimate emergency caller is making multiple calls."

The Hatfield Report

In October 2002, Dale Hatfield, acting as a consultant and at the FCC's request, released the "Report on Technical and Operational Issues Impacting the Provision of Wireless Enhanced 911 Services," and recommended that the FCC continue to support the efforts of the ESIF. ATIS strongly supports the Hatfield Report's recommendation for the development of industry-based voluntary standards needed for the successful rollout of E-911 services. Because the ESIF is comprised of leading subject matter experts, it is well positioned to be a resource to the FCC for the coordination of standards activities relating to E-911.

ATIS also shared the Hatfield Report's recommendation that the Commission suggest to the Administration that a "National 911 Program Office" be established within the Department of Homeland Security, and the creation of organizations at the state, regional and local levels of government that can act as coordinating bodies.

Conclusion

E-911 is an essential element for continued public safety, and ATIS is taking the lead to ensure that the necessary technical and operational industry standards are in place to deploy E-911 services. ATIS considers the development and implementation of these standards to be the fundamental underpinning of effective and sound E-911 service. ATIS' ESIF will continue to bring together the public safety community and the key players from the communications industry to meet the E-911 challenges and develop the essential solutions.

Thank you again for the opportunity to introduce you to ATIS and the ESIF, and to present the important strides the industry has made in advancing the implementation of E-911.