September 15, 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554


Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions (“ATIS”), on behalf of its Emergency Services Interconnection Forum (“ESIF”), submits this correspondence in response to the Federal Communications Commission’s (“FCC’s” or “Commission’s”) Public Notice, in which the FCC seeks comment on a Petition for Rulemaking (“Petition”) filed by the National Emergency Number Association (“NENA”), the Association of Public-Safety Communications Officials-International, Inc. ("APCO"), and the National Association of State Nine One One Administrators (“NASNA”).1 In the Petition, the parties requested that the Commission solicit public comment on the legal preconditions in relevant federal statutes to the release of customer specific information to Public Safety Answering Points (“PSAP’s”) in the course of responding to 911 emergency calls.2

The specific purpose of this correspondence is to bring an ESIF initiative related to the transfer of customer specific information in the context of E911 call responses to the Commission’s attention. Neither ATIS nor the ESIF is commenting on the issues raised in the Petition regarding the preconditions of or the interplay among the relevant federal statutes.

In April of 2003, the ESIF accepted Issue 23, Standardized Wireless Carrier Procedures/Contact Lists Needed for PSAP 9-1-1 Call Investigations. Through this issue, the ESIF will develop a national procedure for wireless carriers to provide current and prior customer information to PSAPs in emergency situations and/or cases of fraudulent use of 9-1-1. Additionally, the ESIF will develop a wireless contact list (e.g., company, name, department, voice and/or fax phone number(s)) for PSAPs to obtain current or prior customer information. Issue 23 was referred to ESIF Study Group E, where a solution will be worked via the consensus process and then presented to the ESIF for consideration and approval.3

3 ESIF has seven active study groups (B through H). Further information on ESIF and its study groups, may be found at http://www.atis.org/atis/esif/esifhome.htm
The ESIF anticipates completing this work by first quarter of 2004. Accordingly, once the issues regarding the relevant federal statues are resolved, the industry will have a process and procedures for the exchange of the necessary customer specific information. We anticipate that the industry and public safety organizations will develop or agree to this procedure, and any applicable forms required for use by PSAPs nationwide.

Should you have any questions on this matter, please contact either myself at (202) 434-8847 or via email at mcampbell@atis.org, or Ed Hall, Vice President – Technology Development at (202) 434-8836 or via email at ehall@atis.org.

Sincerely,

Megan L. Campbell
General Counsel

cc: Jim Nixon, ESIF Chairperson
Astin Buchanan, ESIF Vice Chairperson
Jim Lankford, ESIF Vice Chairperson
Ed Hall, ATIS
Rick Jones, NENA