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

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| In the Matter of | ) | |
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| Location-Based Routing For Wireless 911 Calls | ) | PS Docket No. 18-64 |
| | ) | |

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

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these reply comments in response to the *Notice of Inquiry* (*NOI*), released March 23, 2018, in the above-referenced docket. In the *NOI*, the Federal Communications Commission (Commission) explores how the delays that arise from the misrouting of wireless 9-1-1 calls can be avoided via the implementation of location-based routing solutions. In its comments, ATIS notes that higher-accuracy, lower-latency solutions must be developed before location-based routing can be widely implemented and provides an update on the feasibility study underway within ATIS analyzing location-based routing technologies.

## I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops worldwide standards for information, and communications technologies. ATIS is a key developer of wireless location accuracy and emergency services standards, which are primarily developed through ATIS' Wireless Technologies and Systems Committee (WTSC) and Emergency Services Interconnection Forum (ESIF).

ATIS WTSC coordinates, develops, and recommends wireless radio access, system, and network solutions related to wireless and/or mobile services and systems. It also develops and continues to enhance solutions necessary to support a U.S. public warning system and wireless emergency alert system. With active participation from key wireless service providers and manufacturers, WTSC is the primary industry committee within ATIS that focuses on next generation wireless issues, including those wireless issues related to the implementations of LTE in the U.S. WTSC is also the lead on multiple joint industry standards projects, including work on text to 9-1-1, coexistence and interference issues, WEA, and public safety mission critical Push to Talk (PTT) voice interoperation between Land Mobile Radio (LMR) and LTE systems.

ATIS ESIF develops Next Generation 9-1-1 (NG9-1-1) and location accuracy requirements and solutions, and identifies and resolves technical and operational issues to facilitate interconnection of emergency services networks with other networks (e.g., wireline, cable, satellite, Internet, etc.) and issues related to the delivery of E9-1-1 and NG9-1-1 services. ESIF liaises with standards and government organizations to apprise them of its deliberations and decisions. ESIF also works closely with the Association of Public-Safety Communications Officials (APCO) International, which educates public safety communications professionals, and National Emergency Number Association (NENA), which currently manages the technical evolution of the 9-1-1 system and emergency communications process.

## II. REPLY COMMENTS

In the *NOI,* the Commission seeks comment on the current state of location-based routing and on whether there have been technological advances, developments in industry standards, or other developments that would cause commenters to conclude that the wide adoption of location-

based routing should be pursued.[1] ATIS agrees that location-based routing could improve public safety in some cases, but commenters correctly explain that there are significant technical hurdles to overcome first. As noted below, ATIS believes that additional industry work is needed to identify higher-accuracy, lower-latency solutions before wide adoption of location-based routing should be pursued.

ATIS does not believe that any of the location-based routing solutions identified in the *CSRIC V Location Based Routing Report* (*CSRIC V LBR Report*)[2] would be suitable to address the problem of "misrouted" emergency calls[3] until further analysis of the identified technologies is performed. These solutions, including holding the call until the Phase 2 information is available, using an interim quick-fix, using a geocode-registered or -provisioned civic address, relying on device-based hybrid location, or using wireless location accuracy emerging technologies, each have significant drawbacks and no standards-based technology has been identified that can improve accuracy and latency. Until a higher-accuracy, lower-latency solution emerges, ATIS does not believe that widescale adoption of location-based routing should be pursued. Moreover, while recognizing the serious problem of misrouted calls, ATIS believes that further research may provide additional information on whether geographic-based solutions may be appropriate.

Once the first step in the process – identifying higher-accuracy, lower-latency location methods – has been completed, a second step must be undertaken to explore how that location information might be effectively utilized to improve the routing of 9-1-1 calls. ATIS is working

[1] *NOI* at ¶30.
[2] CSRIC V, Working Group 1, Evolving 911 Services, *Final Report – Task 2: 911 Location-Based Routing* (Sep. 2016) (*CSRIC V LBR Report*).
[3] As noted in the *NOI*, misrouted 911 calls are calls that are received by one PSAP and then transferred to another. The misroutes being examined in the *NOI* do not generally stem from technical failures in routing mechanisms. *NOI* at ¶2 n.1.

on a feasibility study to analyze location-based routing technologies. This study, underway within WTSC and ESIF, is analyzing the location-based routing methods described in the *CSRIC V LBR Report*, as well as other methods that have been identified since the publication of the report. The study is also evaluating existing technologies that could support a location-based routing method and whether there is a need for any new industry standards to support a particular routing methodology. The targeted publication date is late 2018/early 2019. ATIS will inform the Commission and the industry upon publication of this important study.

## III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *NOI* and urges the Commission to consider the recommendations above.

Respectfully submitted,

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