

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

In the Matter of)	
)	
Public Safety and Homeland Security Bureau)	PS Docket No. 21-479
Seeks Comment on Petition for Rulemaking Filed)	
by the National Association of State 911)	
Administrators)	

**Comments of the
Alliance for Telecommunications Industry Solutions**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Public Notice*, released December 10, 2021, in the above-referenced docket. In the *Public Notice*, the Commission seeks comment on a *Petition for Rulemaking; Alternatively, Petition for Notice of Inquiry (Petition)* filed by the National Association of State 911 Administrators (NASNA). The *Petition* requests that the Commission initiate a rulemaking or inquiry to facilitate the implementation of and transition to Next Generation 911 services (NG911) by, among other things, establishing NG911 cost demarcation point or points for allocating costs when the parties cannot agree on the appropriate demarcation points. While expressing no opinion about the other actions requested in the *Petition*, ATIS does not object to the initiation of a Commission rulemaking or inquiry to determine NG911 cost demarcation points.

I. Background

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS' diverse membership includes key

stakeholders from the Information and Communications Technologies (ICT) industry – wireless, wireline, and VoIP service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS’ open industry committees and incubator solutions programs. The input provided in these comments was provided by ATIS’ Emergency Services Interconnection Forum (ESIF) and Network Reliability Steering Committee (NRSC).

ATIS ESIF develops Next Generation 911 (NG911) and location accuracy requirements and solutions. ESIF works with industry, governmental, standards, and public safety organizations to identify and resolve technical and operational issues to facilitate interconnection of emergency services networks with other networks (wireline, cable, satellite, Internet, etc.).

ATIS NRSC was formed in 1993 at the recommendation of the Commission’s first Network Reliability and Interoperability Council. The NRSC, which is comprised of industry experts with primary responsibility for examining, responding to, and mitigating service disruptions for communications companies, strives to improve network reliability by providing timely consensus-based technical and operational expert guidance to all segments of the public communications industry. The NRSC also collaborates with public safety associations and works with the Commission to provide input on Network Outage Reporting System (NORS) and Disaster Information Reporting System (DIRS). NRSC participants are the industry subject matter experts on communications network reliability and outage reporting.

II. Comments

In its *Petition*, NASNA asks the Commission to initiate a proceeding to establish NG911 cost demarcation points for allocating costs when the parties cannot agree.¹ ATIS ESIF and NRSC members do not object to the initiation of an inquiry to investigate NG911 demarcation point or points for allocating costs. This inquiry could address open issues related to this matter, such as whether multiple demarcation points are necessary for diversity purposes, and resolve uncertainties stemming from inconsistent and, in some cases, unclear state requirements. ATIS ESIF and NRSC believe that the industry could benefit from greater Commission guidance regarding the location of these points and the responsibilities of all parties with regard to NG911.

ATIS ESIF and NRSC express no opinion at this time about the other requests made by NASNA in its petition, namely the Commission: establish its authority over originating service providers' (OSPs) delivery of 911 services through IP-based emergency services networks (ESInets); amend 47 C.F.R. §§ 9.4 and 9.5 to advance the transition to and implementation of NG911 services; require the cost of compliance is the responsibility of the OSPs except where cost-recovery is provided by state law or regulation; and implement a NG911 Readiness Registry or establish NG911 readiness "stages or phases" as a mechanism to be used by state/local 911 authorities and OSPs in transitioning to NG911 services.²

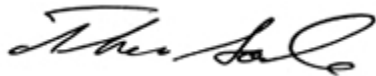
¹ *Petition* at pp. 5-7.

² *Petition* at pp. 2-3.

III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *Public Notice*. ATIS does not object to the initiation of a Commission proceeding to investigate NG911 demarcation point or points.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Goode".

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

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