In the Matter of	)	
	)	
Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications	))	PS Docket No. 11-153
	)	
Framework for Next Generation 911 Deployment	))	PS Docket No. 10-255
	)	

COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION

The Telecommunications Industry Association (TIA) hereby submits comment in
response to the Federal Communications Commission's (Commission) Notice of Proposed
Rulemaking (NPRM) on ways to accelerate the development and deployment of Next Generation
911 (NG911) technology.[1] TIA appreciates the opportunity to provide input on how the
Commission can best encourage the development of innovative technologies that will allow the
public to effectively seek emergency assistance by means beyond traditional voice
communications, and supports the Commission's efforts to facilitate the deployment of NG911
capabilities. As detailed below, TIA believes that the Commission should avoid solutions that are
not technically infeasible or which could chill continued innovation. Similarly the Commission
should take care not to adversely affect the populations the Commission seeks to help, such as
disabled populations and residents of tribal areas, due to a lack of incentive to invest in NG911

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[1] In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications;
Framework for Next Generation 911 Deployment, PS Docket No. 10-255, PS Docket No. 11-153, Notice of Proposed
Rulemaking (rel. Sept. 22, 2011) ("NPRM").

solutions. TIA believes that the most effective way to address a short-term solution is to adopt the recommendations of the AISP.7-Interim Non-voice Emergency Services (INES) Incubator, of which TIA is a member.

I. INTRODUCTION AND SUMMARY

TIA represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshows, business opportunities, market intelligence and world-wide environmental regulatory analysis. For over eighty years, TIA has enhanced the business environment for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. TIA's 500 member companies' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment and entertainment. TIA is accredited by the American National Standards Institute (ANSI). In both the policy and standards realm, TIA addresses numerous aspects the Commission examines in this item, including accessibility to devices for disabled populations, emergency communications, and network reliability.

TIA is a longtime supporter of the Commission's efforts to improve emergency communications comprehensively. The development of an IP-based network where public safety answering points (PSAPs) can receive diverse forms of communication will greatly benefit each citizen of the United States, particularly disadvantaged populations targeted by the Commission. In evaluating how best to deploy a next generation 911 (NG911) network as soon as technically feasible, the Commission should be mindful of the need to develop technologies that will

facilitate such a network.

In the short-term, TIA supports the adoption of the recommendations agreed to by the Interim Nonvoice Emergency Services (INES) Incubator, which TIA is a member of. As detailed in its recommendations, the INES has undergone a comprehensive analysis in this undertaking, which included consultation with representatives from all stakeholders, as well as consideration of a detailed list of criteria detailed in the INES recommendations. Based on this analysis, which included concluding that SMS is not a realistic option for a short-term solution, the INES has recommended that internet protocol (IP) Relay be recognized as a viable short-term solution. TIA also believes that the Commission should provide increased certainty for stakeholders by stating that entities supporting the INES-proposed solution are allowed the same liability protections as wireline 911 communications. The Commission should undertake a consumer education program to ensure consumer awareness of 911 capabilities.

In the development of long-term solutions, TIA urges the Commission to allow for and encourage the development of voluntary, consensus-based standards, which will include detailed study in such areas as interoperability, portability, and security, among others. In addition, an incentives-based approach based on best practices will also most efficiently bring about a successful NG911 ecosystem. In the long-term, it will also be critical for the Commission to continue on its mission to reduce regulatory barriers to investment and innovation. This can be done by such actions as use of technology neutral regulations that consider distinctive geographic, radio frequency, and technology feasibility characteristics particular to certain areas of the country, as NG9-1-1 deployment will occur through a phased-in approach, and turn on local decisions and funding, as well as providing clarity on liability to the providers of NG911 services. Finally, the Commission should undertake a long-term consumer outreach effort that

utilizes the same model as the existing public-private partnership working to increase broadband adoption.

TIA also believes that in the adoption of any new regulations for NG911, the Commission should first establish a record that there is a stronger public interest in mandatory location identification functionality in IP-enabled devices. New regulations in this area would chill innovation and investment. Instead, the Commission is urged to support and facilitate improvements to location accuracy, through such successful undertakings as the CSRIC, as well as the creation of the CSRIC-recommended E9-1-1 Technical Advisory Group (ETAG).

Finally, TIA urges the Commission to reserve full consideration of the recommendations of the Emergency Access Advisory Committee (EAAC). The EAAC has a further year remaining to complete its work, and will not be submitting a complete report of recommendations to the Commission this year. It would be more appropriate for the Commission to reserve judgment on the recommendations of the EAAC until they are completed.

II.   TIA SUPPORTS THE COMMISSION'S NG911 EFFORTS

As TIA has noted in earlier comments in this docket, supports the inclusion in the NG911 network of enhanced methods to deliver emergency information described in the Notice once technologies are developed to meet the needs of 911 communicators and the public.[2] The benefits of NG911 deployment are numerous,[3] and a fully-realized NG911 system will result in a greatly enhanced level of safety for every American. NG911 will require a multifaceted

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[2] TIA NOI Comments at 3.

[3] NPRM at ¶33.

implementation with numerous components relative to existing emergency communications services. TIA agrees with the Commission's decision to address the short- and long-term aspects of such a deployment separately, and, as detailed below, supports the adoption of the recommendation of the INES as a short-term solution, and encourages maximum flexibility for the development of voluntary, consensus-based standards that will drive innovation in an efficient and cost-effective manner.

The Commission requests input on the benefits and costs of advanced text-to-911 and multimedia services, such as those based on SIP and Real Time Text (RTT), to improve the accessibility of the 9-1-1 system.[4] TIA agrees that the addition of such services as a long-term solution is correct and appropriate and will enhance access to emergency services for all Americans. TIA is committed to increased access to emergency services, especially for disabled populations, and agrees with the approach of implementations of both short- and near-term solutions.

> A. *TIA URGES THE COMMISSION TO ADOPT THE RECOMMENDATIONS OF THE INES INCUBATOR AS A SHORT-TERM SOLUTION, AND SUPPORT THE SHORT-TERM SOLUTION THROUGH EDUCATIONAL EFFORTS*

In the NPRM, the Commission requests input on whether and how the Commission should encourage the development of interim text-to-911 capabilities before a long-term NG911 solution is available.[5] TIA, as an active participant in the INES, believes that under the circumstances the Commission should adopt the INES recommendations for internet protocol (IP) relay as the short-term solution, as well as ensure consistency with the INES'

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[4] *See e.g.*, NPRM at ¶70.

[5] NPRM at ¶33.

recommendations in any new regulations that it may adopt in this matter.

As detailed in the INES' final report,[6] the INES cast its net very wide in analyzing possible interim text-based solutions, finally settling on IP Relay after much discussion, consultation with the disability community, and consideration within the INES based on a detailed set of criteria. In eliminating other possibilities, the effects on all relevant stakeholders (users, PSAPs, carriers, and manufacturers) were carefully included in the INES' analysis.

Because the Commission seeks comment on its proposal that PSAPs, providers, and vendors have the option to implement direct SMS to 9-1-1 as a short-term alternative,[7] TIA would like to specifically note its support for the INES' determination that SMS relay is not an appropriate solution due to the limitations of SMS-based systems, many of which are noted in the NPRM itself,[8] and the effectiveness of such a system in meeting the needs of the short-term solution. This determination is consistent with TIA's previous assertion in this docket that the limitations of SMS for transmission of emergency calls to a PSAP should preclude its use, and would only be appropriate after considerable industry standards work when it is clear that industry efforts are better spent on the development of a new IP protocol that is better adapted to the demands of emergency calls.[9] TIA fully supports the INES final report, and agrees that IP Relay presents a viable short-term solution (including the target deployment date agreed to be June of 2012) with minimal limitations for a text-to-9-1-1 offering for persons with disabilities, and is currently widely available to address individual needs. We are also committed to future

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[6] ATIS Interim Non-Voice Emergency Services (INES) Report and Recommendations (Rel. Dec. 12, 2011), *available at* http://www.atis.org/docstore/product.aspx?id=26035 (INES Recommendations).

[7] NPRM at ¶54.

[8] NPRM at ¶28.

[9] TIA NOI Comments at 7.

work within the INES as described in the final report.[10]

The Commission also seeks input on what it can do to help facilitating the short-term deployment of text-to-911 using existing infrastructure.[11] TIA believes that, in addition to adoption of the INES-recommended short-term solution, the Commission should focus its efforts on creating increased regulatory certainty for stakeholders by clarifying that the INES solution qualifies for liability protections under the New and Emerging Technologies 911 Improvement Act of 2008.[12] Further, the Commission should, related to the short-term solution, focus on (1) providing educational outreach to consumers through existing and new public-private partnerships,[13] (2) ensuring that any policies in place or adopted moving forward do not hinder the implementation of the INES' recommendations, and (3) comprehensively planning for as seamless a migration from the short-term solution into a long-term solution.

B.   *THE COMMISSION SHOULD ENCOURAGE THE USE OF VOLUNTARY, CONSENSUS-BASED STANDARDIZATION AND ALLOW FOR MAXIMUM FLEXIBILITY IN COMPLIANCE WITH ANY ADOPTED REGULATIONS AS A LONG-TERM SOLUTION FOR A SUCCESSFUL NG911 DEPLOYMENT*

TIA firmly believes that market-based standardization efforts, not regulatory mandates, should determine the long-term solution for the NG911 system, and should be encouraged by the Commission to swiftly deploy these and other capabilities. As TIA has noted before, fundamental capability developments that are required for the envisioned NG911 network are far

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[10] INES Final Report at 22.

[11] NPRM at ¶33.

[12] New and Emerging Technologies 911 Improvement Act of 2008 (NET 911 Act), Pub. L. No. 110-283, 122 Stat. 2620 (2008).

[13] TIA suggests that the Commission undertake an approach much like that used in furtherance of its broadband deployment. As it was reported during the Commission's November 30, 2011 Open Meeting, the Commission has secured significant commitments at no cost to taxpayers. *See* FCC, *Broadband Adoption Taskforce: Presentation to the Federal Communications Commission* (Nov. 30, 2011), *available at* http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db1130/DOC-311281A1.pdf.

from attainable, and there is a need for a need for a better consolidation of coordination efforts, the development of operational procedures, and the refinement of technical standards.[14] Because of these needs, TIA agrees that "individual PSAPs are likely to have highly varying timetables for developing the technical and operational capability to handle incoming texts in the short term, as well as texts and other media in the longer-term implementation of NG911,"[15] and believes that the Commission should ensure that maximum flexibility is given to network providers and PSAPs. The Commission can accomplish its goals while providing this flexibility by focusing on the following priorities:

1. ENCOURAGEMENT OF THE DEVELOPMENT OF VOLUNTARY, CONSENSUS-BASED STANDARDS AND BEST PRACTICES.

Allowing for the development of voluntary, consensus-based standards – which will naturally include detailed study to ensure that interoperability, portability and security (among other) concerns are fully addressed – will most efficiently ensure that the Commission reaches its goals for the NG911 system, particularly given the convergence of interests that must be taken into account.[16] Standards for NG911 network standards are already underway, and the Commission would be remiss not to embrace these efforts into its approach as it determines long-term solutions for the NG911 system. Embracing the development of these standard developments and avoiding imposing new regulations would streamline this standardization process further.

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[14] *See* Comments of TIA, PS Docket No. 10–255 (filed Feb. 28, 2011) at 3-6 (TIA NOI Comments).

[15] NPRM at ¶9.

[16] *See, e.g.*, TIA NOI Comments at 4 (noting that emergency services networks must be coordinated on a nationwide basis in order to appropriately support the implementation of cyber security protections that will be necessary to prevent attacks that could cripple NG911 systems).

TIA is a stakeholder in this standards ecosystem as a developer of standards in a broad range of areas,[17] from data center guidelines,[18] to – more recently – a reference architecture for smart device communications.[19] As part of the standard development process, TIA and other standard developers regularly coordinate efforts and share information, ensuring that standards adhere to overarching network standards for integrated wireless voice, text and video capabilities, ensuring interoperability. In this way, via the voluntary, consensus-based standardization process, integration of such services as TIA's machine-to-machine communications architecture can be assured of interoperability with the NG911 system. Given this successful environment, TIA does not see a need for the Commission to align standards activities pertaining to NG911.[20] In addition, the standardization process most efficiently allows for NG911 system interoperability with existing and emerging standards.[21]

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[17] TIA publishes an annual report that includes the latest actions taken by each respective TIA engineering committee toward the development of standards for the advancement of global communications. *See* TIA, *Standards & Technology Annual Report* (September 2010), available at http://tiaonline.org/standards/about/documents/StarReport_09-10.pdf.

[18] TIA-942 provides requirements and guidelines for the design and installation of a data center or computer room. It is intended for use by designers who need a comprehensive understanding of the data center design including the facility planning, the cabling system, and the network design. The standard will enable he data center design to be considered early in the building development process, contributing to the architectural considerations, by providing information that cuts across the multidisciplinary design efforts; promoting cooperation in the design and construction phases. Adequate planning during building construction or renovation is significantly less expensive and less disruptive than after the facility is operational. Data centers in particular can benefit from infrastructure that is planned in advance to support growth and changes in the computer systems that the data centers are designed to support. This standard presents an infrastructure topology for accessing and connecting the respective elements in the various cabling system configurations currently found in the data center environment. In order to determine the performance requirements of a generic cabling system, various telecommunications services and applications were considered. In addition, this document addresses the floor layout topology related to achieving the proper balance between security, rack density and manageability. *See* http://www.tiaonline.org/standards/catalog/index.cfm.

[19] TIA-4940.005, Reference Architecture for Smart Device Communications, is the first document of a multi-part standard that, when taken in total, defines the requirements for communications pertaining to the access agnostic (e.g. PHY and MAC) monitoring and bi-directional communication of events and information between smart devices, applications or networks. *See* http://ftp.tiaonline.org/TR-50/Public/20110321_Joint_TR-50_ETSI_TC_M2M/TR50_ETSI-20110321-002_Reference_Architecture.pdf.

[20] NPRM at ¶77.

[21] NPRM at ¶58.

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In the NPRM, the Commission requests input on whether an incentive-based approach should be employed, or if the Commission should adopt "deadlines, timetables, or uniform network interface standard requirements." [22] TIA suggests to the Commission that an incentives-based approach based on best practices will deliver the highest level of interoperability. Such an approach would be consistent with the recommendations submitted in the recent CSRIC Working Group 6 report, which stated:

> The FCC should continue to endorse the use of [best practices] by communications industry organizations. The FCC has a long history of supporting industry's development and utilization of [best practices] through its previously chartered Advisory Committees, including NRIC and the Media Security and Reliability Council (MSRC). The FCC should maintain this support based upon the work of CSRIC during its current and any future chartered terms.[23]

Based on TIA's membership in the CSRIC and its support of the use of best practices, TIA also endorses the proposed creation of best practices within the CSRIC as suggested in the NPRM.[24]

2. POLICIES THAT PROVIDE FLEXIBILITY, CERTAINTY, AND TECHNOLOGY NEUTRALITY WILL PRODUCT MARKET-DRIVEN INNOVATION

Different needs of NG911 providers will naturally create necessarily different approaches to establishing the NG911 network. Each stakeholder will need to take a path based on their abilities, requirements, obtainable resolutions, and finances, among other factors. TIA is a long-time supporter of Commission policies that promote technology neutrality and reductions in

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[22] NPRM at ¶89.

[23] CSRIC WG6, *Best Practice Implementation, Final Report* at 17, January 2011, *available at* http://transition.fcc.gov/pshs/docs/csric/WG6-Best-Practice-Implementation-Final-Report.pdf. .

[24] NPRM at ¶89.

regulatory barriers,[25] in which standards and products are developed by market-driven dynamics and open, transparent processes. Furthermore, any Commission requirements for emerging emergency communications using IP should be kept as simple as possible. For example, TIA has previously suggested that, for VoIP, only the most basic functionality should be required (*e.g.*, in terms of codecs, support for the ITU G.711 standard).[26] If requirements are used in this way, it is much more likely that technology and competitive neutrality will be promoted consistent with the Commission's practice, realistic expectations are widely understood, and the private sector can then meet or exceed them.

As far as any regulations adopted, if they must be, the most effective and efficient means of developing the current national 911 infrastructure into the conceptualized NG911 network will be accomplished through the continuation of light-touch, technology neutral regulations that consider distinctive geographic, radio frequency, and technology feasibility characteristics particular to certain areas of the country, as NG9-1-1 deployment will occur through a phased-in approach, and turn on local decisions and funding. The Commission should ensure that it does not derail any ongoing efforts through the adoption of new rules that would affect that work. Based on this, TIA opposes the creation of any timetables under this docket as they would likely derail ongoing standardization efforts already underway.[27] TIA believes that competition, not prescribed deadlines, should determine the timeline for a NG911 rollout.

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[25] *See* The FCC's Broadband Acceleration Initiative: Reducing Regulatory Barriers to Spur Broadband Buildout (rel. Feb. 3, 2011) available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0209/DOC-304571A2.pdf. *See also* Remarks of FCC Chairman Julius Genachowski, Broadband Acceleration Conference (Feb. 9, 2011) at 1-2 ("One thing government at all levels can do is ensuring efficient, effective regulation. We need rules that serve legitimate public needs without erecting costly or unnecessary barriers…Overly burdensome rules and regulations can slow down deployment and raise costs. It also can limit businesses ability to invest in new technologies and hire new workers.")

[26] TIA NOI Comments at 8.

[27] NPRM at §83.

Undertaking the approaches discussed in this section will also mean lower financial burdens on state and local governments, and enable the most rapid and uniform rollout of NG911, and this is critical in times of tight budgets.

3. LIABILITY PROTECTION FOR NG911 STAKEHOLDERS

It is critical that the Commission minimize disincentives to invest in NG911 technologies in a way that provides as much investment certainty as possible. For this reason, TIA again notes its support for the proposal that liability protection extend to all forms of information pushed to a PSAP or pulled from external sources by a PSAP, regardless of the platform over which information travels.[28] The Commission should, once the NG911 long-term solution is determined, evaluate and expeditiously determine if that solution qualifies for liability protection under the NET 911 Act, providing immense security to stakeholders and room for innovation. TIA therefore agrees that "states should be required to demonstrate that they have adopted appropriate or removed outmoded legal or regulatory measures to facilitate NG911 deployment, such as deregulation of legacy 911 interconnection arrangements and enactment of liability protection for NG911 providers and service providers."[29]

4. CONSUMER EDUCATION

TIA believes that the Commission indeed has a role in consumer education related to long-term NG911 capabilities as the system is deployed. A collateral risk associated with

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[28] TIA NOI Comments at 6-7.

[29] NPRM at ¶99.

increasing the modes of communications that the public can use to access emergency

communication is that public expectations could exceed the PSAP's actual capabilities or even

reduce information required by first responders. For example, emergency communicators are

trained to obtain critical information from their interactions. Direct real, time interaction allows

emergency communicators to effectively elicit information essential for first responders.

Consumer education can help the public to communicate effectively with PSAPs.

The Commission will be critical in disseminating this information to the public. Similar

to TIA's recommendation for short-term solutions, TIA believes that the Commission should

undertake their NG911 long-term consumer outreach in the form of a public-private partnership

modeled on the November 30, 2011-reported Broadband Adoption Taskforce. This effort to date

has been successful and TIA believes that its model would reap similar results in the long term –

even more so if rolled into or coordinated with the work of the Broadband Adoption Task Force.

TIA is ready to work with the Commission in these efforts.

III. USER LOCATION TRACKING POSES SIGNIFICANT TECHNICIAL AND POLICY HURDLES FOR E911 TIA ENCOURAGES THE COMMISSION TO ADOPT CSRIC'S RECOMMENDATION TO FORM AN ADVISORY COMMITTEE

The Commission appropriately noted in its NPRM that there are significant technical

challenges associated with incorporating location information with advanced emergency

messages, as well as the variety of initiatives to address these problems.[30] TIA believes that the

Commission should proceed carefully before imposing further user location tracking mandates

on IP-enabled devices. As a threshold question, before addressing the issues of technological

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[30] *See, e.g.*, NPRM at ¶43, 44 (noting existing text-to-911 trials which do not convey location information).

feasibility, the Commission should establish a solid record that there is stronger public interest in creating a broader location identification functionality within IP-enabled devices. [31] As the Commission has noted, privacy protections for telecommunications users are a critical part of obligations that the industry operates within.[32]

This framework has created among the strictest privacy protection regimes of any industry sector. Before proceeding with expanded location tracking requirements, it is essential to first establish that users actually have an expectation that their location can be ascertained. Unless users actually expect their IP-enabled devices or services to be able to make emergency communications, then adding tracking functionality to them would have both limited public safety benefit and would come at the cost of undermining the trust they have in telecommunication services. As a result, a careful balance needs to be struck between these two competing interests of user privacy and public safety. TIA believes that further extension of 911 obligations past their current reach to emerging technologies is premature and would hurt investment and innovation. Further research and development is needed first. TIA also reiterates that new regulations at this time will inhibit or discourage such standards development, and that the most effective way for the Commission to facilitate improvements in location accuracy is to support the implementation of standards and best practices, namely by refraining from creating more regulatory burdens to innovation.[33]

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[31] Comments of TIA, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109 (filed Apr. 18, 2011) at 15-16.

[32] In the Matter of Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules; Wireless E911 Location Accuracy Requirements; E911 Requirements for IP-Enabled Service Providers, *Notice of Proposed Rulemaking, Third Report and Order, and Second Further Notice of Proposed Rulemaking*, GN Docket No. 11-117, PS Docket No. 07-114, WC Docket No. 05-196, FCC 11-107 (rel. Jul. 13, 2011).at ¶76.

[33] *See, e.g.*, Comments of TIA, PS Docket No. 07-114, WC Docket No. 05-196 (filed Jan. 19, 2011) at 8-9.

Given the complexities as well as harms to innovation and investment, resulting from expanding location accuracy requirements at this time, TIA again recommends that the Commission establish an ETAG as proposed previously by TIA, CTIA, The 911 Industry Alliance, and a host of other interested parties.[34] In response to the Commission's Notice of Inquiry on 911 location accuracy, commenters from both public safety and industry suggested deference to CSRIC WG 4C reports.[35] In that same report, CSRIC WG 4C strongly recommended the creation of the ETAG to conduct further study, stating:

> The Working Group recommends that the FCC establish an E9-1-1 Technical Advisory Group ("ETAG") to address specific location technology issues for 9-1-1. The ETAG concept, which interested stakeholders have championed for several years, offers the best and most constructive path towards improved E9-1-1 accuracy. The ETAG, which should include representatives from all sectors of the industry, including public safety, carriers, technology vendors and key stake holders, would work cooperatively and expeditiously to enhance location accuracy and to improve the manner in which location accuracy is measured. The ETAG would also validate the feasibility and capabilities of emerging E9-1-1 location accuracy technologies in a standardized, real-world test environment. The ETAG should study how to improve location accuracy in challenging environments, including indoor settings, urban canyons, high-rises, rural environments and areas of heavy forestation or mountainous terrain etc.[36]

Based on the consensus of opinions, TIA believes that the decision to move forward and subject

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[34] *See, e.g.*, Comments of TIA, PS Docket No. 07-114 (filed Oct. 14, 2008) at 9; Comments of the Alliance for Telecommunications Industry Solutions (ATIS), PS Docket No. 07-114 (filed Oct. 14, 2008) at 10; Comments of CTIA, PS Docket No. 07-114 (filed Oct. 14, 2008) at 9; Comments of Ericsson, PS Docket No. 07-114 (filed Oct. 14, 2008) at 2-5; Comments of The 911 Industry Alliance, PS Docket No. 07-114 (filed Oct. 14, 2008) at 2; Comments of AT&T, PS Docket No. 07-114 (filed Oct. 14, 2008) at 4, 13; Comments of Nokia Inc. and Nokia Siemens Networks, PS Docket No. 07-114 (filed Oct. 14, 2008) at 6; Comments of Motorola, PS Docket No. 07-114 (filed Oct. 14, 2008) at 4-6; Comments of Sprint Nextel Corporation, PS Docket No. 07-114 (filed Oct. 14, 2008) at 3; Reply Comments of The Emergency Services Interconnection Forum Comments of the Alliance for Telecommunications Industry Solutions, PS Docket No. 07-114 (filed Dec. 4, 2008) at 4-5; Reply Comments of The Center for Democracy and Technology/EFF, PS Docket No. 07-114 (filed Dec. 4, 2008) at 2.

[35] *See, e.g.*, Comments of Association of Public-Safety Communications Officials-International, Inc., PS Docket No. 07-114, WC Docket No. 05-196 (filed Jan. 3, 2011) at 5-6; Comments of Motorola Mobility and Motorola Solutions, PS Docket No. 07-114, WC Docket No. 05-196 (filed Jan. 3, 2011) (Motorola Mobility and Motorola Solutions Comments) at 8.

[36] *See* CSRIC, Working Group 4C, Technical Options for E9-1-1 Location Accuracy, Final Report at 60

nascent services to 911 obligations is not the correct decision for the Commission at this time.

The Commission should instead create the ETAG, which will help to ensure that cross-industry

and public safety concerns and expertise are considered, and will encourage continued dialogue

on how best to empower carriers, vendors, and other stakeholders to provide further advanced

E911 technologies.

It is clear to TIA that efficient and accurate implementation of improved location

accuracy requirements to increasingly prevalent IP-enabled devices will be impossible without

the technical expertise of all stakeholders, including wireless network manufacturers, wireless

device manufacturers, carriers, and public safety. TIA members are instrumental in developing

technologies for wireless networks and wireless devices related to E911 location provision. Such

expertise, complementing that of wireless carriers, vendors of location solutions, and public

safety entities is essential in guiding compliance with new E911 accuracy standards. As the

CSRIC has made clear, an ETAG will enable experts from all key stakeholder groups to work

together on the considerable complexities of carrying out the Commission's new E911 accuracy

requirements.[37]

IV. THE COMMISSION SHOULD RESERVE JUDGEMENT ON CONSIDERATION OF EAAC SUBMISSIONS UNTIL THE EAAC FULLY COMPLETES ITS RECOMMENDATION REPORT

In the NPRM, the Commission seeks input on the inclusion of the Emergency Access

Advisory Committee's (EAAC) recommendations into the record in this proceeding.[38] As a co-

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[37] *See Id.*

[38] NPRM at ¶114.

chair of the EAAC, TIA fully supports the effort of ensuring that IP-enabled emergency communications are accessible to persons with disabilities. However, as the Commission is aware, the EAAC has a further year of work before their charter terminates, and a great deal of work is planned. The EAAC will not be submitting a full report of recommendations to the Commission this year. As the work of the EAAC is not yet close to complete, TIA at this time urges the Commission to fully considering EAAC-submitted recommendations until the EAAC has fully completed its report to the Commission.

V.   CONCLUSION

TIA reiterates its support of the Commission's efforts to transition to an NG911 system that will greatly enhance the lives of all Americans. We encourage the Commission's consideration of the above positions.

Respectfully submitted,

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