Sarah E. Brown
4250 Garrison St, NW Apt. 10 • Washington, DC 20016 • (410) 490-8486 • sebrown118@gmail.com

To Whom it may Concern,

I am writing the FCC to comment and voice my support for the changes outlined in 911 Governance and Accountability; Improving 911 Reliability; docket numbers PS 14-193 and PS 13-75. 911 reliability is a growing issue in America. While previous rules and regulations from the FCC have strengthened 911 reliability, still more needs to be done. Over the past few years, there have been far too many periods of 911 outages and we will never truly know the number of people adversely affected by these outages. This is why I support the proposed outlined in the NPRM.

At the heart of all of the proposed rules is one of the fundamental purposes of the FCC, “to promot[e] safety and life and property through the use of wire and radio communications.” The FCC needs to do more to promote safety and further regulating the use of 911 service providers is one of the most important ways to do this. While I believe the FCC should regulate 911 service providers to make the service more reliable, I do believe that the states and localities should still have ultimate jurisdiction over these issues, as it is not 100% clear that the FCC has the power to be regulating 911 service providers. Though, because of the importance of this issue, I believe that the positive reasons for enforcement outweigh the possibility of the FCC not having the power to regulate.

All of the proposed rules stated here address some of the biggest issues regarding 911 service providers: public trust, accountability, and preparedness. Above all other FCC regulated areas, the public needs to have the most trust in 911 service providers. As much as people care about watching shows via broadcast and getting the best internet service, people are more concerned about their safety in an emergency. People need to be able to trust in a system that they can use when they truly need it. The problem is, often when people most need to trust in the 911 system the service is unavailable to them. For example, during the 2012 derecho storms, the 911 outage caused countless number of people to be unable to reach help. These are the times when the public need this service the most, and the FCC must do more to ensure access to it.

The people also need 911 service providers to be held accountable for their actions, especially when there are outages. We need more oversight of these providers, and not just the traditional ones, but the new and diverse providers who are popping up with new technologies. The FCC must grow with these services and continue to provide support in this new age.

With accountability also comes preparedness. The FCC must do more to ensure that these providers are prepared for outages. While we would like to eradicate all 911 outages, that does yet not seem possible. These new regulations will mandate that 911 service providers are more prepared and will be able to more affectively deal with outages as they occur.

I 100% support three of the four proposals. I first agree with the suggested changes to the Commission’s 911 reliability certification rules to cover additional entities and network reliability practices that are vital to call completion. The reliability certifications currently in place should be extended to any provider who deals with 911 calls. This expanded scope will ensure that more 911 providers are doing all they can do to prevent outages and have more reliable service. I agree that this will not change the overall duties of the providers. While I am unsure of the feasibility of extending these requirements, I do not think that should matter. Even if there are impasses in the way, it is imperative that these agents and sub-contractors (and all
other parties) be required to meet the certification procedures. It is important that all involved with 911 service be held to the same standards. This is because we want to ensure that all people have equal and open access to 911 service when needed. While some argue that this could hinder technological innovation, I do not share this belief. There can still be technological innovation even if certification is required. It will just ensure that when new technologies do become available they are going to effectively do their jobs and allow people to get the help they need.

I also fully support the proposed change that requires public notification for major changes in multistate 911 networks and services. This will provide more transparency to the public, which will keep them better informed about the services. As noted in the NPRM summary, this public disclosure is a major step towards increasing accountability. Regarding the actual notification requirements, I believe that all parties (OSPs, ILECs, SSPs, and sub-contractors) should all be responsible for reporting their own changes. While I understand that some may want these ILECs and SSPs to report for their contractors, the reporting would be done more efficiently if the sub-contractors have to report directly to the FCC, but inform other parties in the process. This way, the FCC is able to get the information about any changes as soon as possible, and it removes unnecessary delays.

The NPRM also proposes Commission approval for discontinuance of existing 911 services. While the FCC should rely on states and localities to oversee discontinuance, this will only work in certain situations. But if a provider crosses state and jurisdictional lines this could get blurry. But regardless, I think it important that as much of this oversight stay at the state level as possible, it will be easier for states to create a more transparent and accountable system. It is important to keep the oversight power with the state to allow for quick response times that are tailored towards local communities.

I just want to note that I support the proposed changes requiring entities seeking to provide new 911 capabilities to certify as to their technical and operational capability to provide reliable services. But I want to keep this oversight authority with the state and local authorities. They should have the lead in this area, not the FCC.

I want to thank the FCC for taking this problem so seriously. I believe that this NPRM will result in major advancements for 911 service providers and hopefully lead to fewer outages in the future.

Best,

Sarah Brown