My name is Elizabeth Reynolds, aged 19 and current freshman at Dartmouth College in Hanover, NH. My comment on the proposed rule 911 Governance and Accountability represents a citizen's opinion of how emergency response services should operate. An efficient and reliable system is necessary: we citizens need to feel protected at all times, and potential criminals must be deterred from illegal activity by a fear of accountability. The public should be well informed about how the system operates; the 911 emergency response system must be well regulated; all information regarding the emergency response system’s operational status should only be accessible to the necessary players.

- **Should changes in the 911-network architecture be subject to notification requirements, and if so, who should provide the notification? Who should receive the notification?**
- **How long is sufficient time for public inspection of 911 network changes without unnecessarily delaying beneficial network changes?**

In accordance with the proposed rule, I agree that the 911-network system must be transparent. As of now, most citizens do not understand how the 911-system operates. Most believe that calling 911 means immediate attention to and salvation from the emergency at hand, and do not realize that 911 networks can fail, currently operate off of dated technologies, or that 911 calls often cross state boarders. The public must be aware of how the 911-system works, the flaws in the system, and any changes to the system in order to have realistic expectations in the case of an emergency.

The Commission in charge of overseeing the 911 service providers should also be charged with conveying any 911 operational changes to the public. 911 service providers
must report any such changes to the Commission, and the commission should send this information to the affected public. This way, the Commission must ultimately approve any change in the 911 network and citizens get their information from one reputable source.

The most effective ways to communicate changes or any information about the 911 network to the public would be through a combination of reverse 911 calls, social media, local news station coverage, a notification system that operates similarly to the Amber Alert system, and by encouraging citizens to share news of the changes with their neighbors and discuss the changes throughout the community. This way the most of the affected citizens will become aware not only of the changes taking place, but how these changes may personally affect them.

The proposed required 60-day wait period before implementing changes in the 911 system is too long for most scenarios. Only in the cases in which citizens must change aspects of the 911 emergency response system on their end should have a 60-day wait period. Information is useful and should be understood by the masses; however, the majority of US citizens do not care about how exactly the improvement is being made as long as they feel that the 911 system is effective. Therefore, changes should be made on the company end as soon as ten days after notification.

- **Is it sufficient for service providers to conduct their own analysis or should we require analysis and certification by an independent third party?**

911 service network providers are businesses, and so a third party must be charged to ensure that system changes do not jeopardize the citizen. This third party should act as a branch of the Commission, gather 911 emergency response times and call efficiency, evaluate the branch’s day-to-day operational efficiency, and determine whether or not
certain service providers deserve certification. Increased regulation of the service means a stronger and more reliable network, because there is less of a chance for general operational errors or malpractice.

- Should 911 NOC providers be required to maintain a Web page that provides key information on the status of their 911 networks? Should such Web pages be available to the public, or only to PSAPs and other covered 911 service providers?

911 NOC providers should never publically publish information about the operational status of 911 systems. Only PSAPs should have access to this knowledge, as they must be aware of network failures in order to fix the glitches efficiently and/or devise alternate methods for providing temporary coverage in the failing areas of the system. Such information should be kept under high security. If this knowledge were readily accessible, criminals could capitalize on an opportunity to act, and the general public would face a general sense of distrust and paranoia whenever the network is not functioning properly.

Although my comment does not answer the technical questions posed in the proposed rule 911 Governance and Accountability, I hope you can see the merit of an opinion created by the average citizen, and consider tweaking the 911 emergency response system in the aforementioned ways.