Jill Coogan and David Furth, FCC:

Outstanding Questions:

Will the PSHSB be addressing the issues raised in the NASNA petition within the coming months?

On May 18, 2023, the Commission released a draft Notice of Proposed Rulemaking (NPRM) in PS Docket No. 21-479. The draft NPRM addresses issues raised in the NASNA petition and, if adopted, would take steps to advance the nationwide transition to NG911. *See* https://docs.fcc.gov/public/attachments/DOC-393513A1.pdf. The NPRM is scheduled for consideration by the Commission at its open meeting on June 8, 2023. In addition, in December 2022, the Commission released an NPRM on Location-Based Routing (LBR) that addressed some issues raised in the NASNA petition as they pertain to wireless carriers. *See Location-Based Routing for Wireless 911 calls*, PS Docket No. 18-64, Notice of Proposed Rulemaking, FCC 22-96 (PSHSB Dec. 22, 2022), https://www.fcc.gov/document/fcc-proposes-rules-location-based-routing-wireless-911-calls.

Has there been any consideration of routing the calls by location rather than area code? …9-8-8 calls

Geolocation and/or routing services are not currently enabled or required for 988. The Commission held a 988 Geolocation Forum in May 2022 that discussed technical, legal, privacy, and cost considerations associated with geolocation and routing of 988 calls. The agency is actively analyzing the information gathered during that forum, including whether potential routing improvements could help callers to 988 connect to the regional call centers where they are located without sharing geolocation information.

Do the accuracy requirements for 911 calls include a time factor after delivery? Historically, many wireless calls will be delivered Phase 1 initially and then Phase 2 after one or two re-bids. Is part of the requirement an immediate delivery of an accurate location?

Current FCC rules do not require wireless carriers to provide the caller's location immediately upon routing the 911 call to a PSAP.   Wireless carriers route 911 calls within the first few seconds of placing the call with whatever location information they have, which historically has been based on cell tower location (Phase I data). As the call progresses, the carrier acquires more precise information about the caller's location (Phase II data), which the PSAP can obtain by automatically or manually bidding for the updated location. For purposes of measuring compliance with the Commission's wireless location accuracy rules, the carrier will be deemed to satisfy the standard only if it provides the required degree of location accuracy within a maximum latency period of 30 seconds. 47 CFR § 9.10(h)(3).

In recent years, wireless carriers have introduced technological improvements that enable 911 calls to be routed based on the caller's actual location rather than the location of the nearest cell tower. Based on these improvements, the Commission's December 2022 NPRM on Location-Based Routing (LBR) proposes to require CMRS and covered text providers to use location-based routing "if caller location information is available at the time that the provider would otherwise route the call," but to otherwise route the call based on the best location information available, which could be tower site information. *Location-Based Routing for Wireless 911 calls*, PS Docket No. 18-64, Notice of Proposed Rulemaking, FCC 22-96, at 16-17, 21, paras. 38-39, 53 (PSHSB Dec. 22, 2022), https://www.fcc.gov/document/fcc-proposes-rules-location-based-routing-wireless-911-calls. The LBR proceeding remains pending.

Who is responsible for enforcing infractions of Kari / Ray Baum's law?

In most cases, the FCC is responsible for enforcing both Kari's Law and RAY BAUM'S Act (KL/RBA*). See, e.g.*, 47 U.S.C. §§ 623(d),(e) (enforcement of Kari's Law); 47 CFR § 9.16 (FCC regulations implementing KL); 47 CFR § 9.17 (FCC regulations regarding enforcement of KL); 47 U.S.C § 615 Note (Section 506 of RBA); 47 CFR § 9.16(b)(3) (FCC regulations implementing Section 506 of RBA); 47 U.S.C. § 501 *et seq.*(FCC enforcement authority).

Does Z-axis and dispatchable location rules apply to 911 text calls/sessions?

The Commission's rules require that 911 texts should provide dispatchable location and/or other location information, which can include coordinate-based information. Under 47 CFR § 9.10, "No later than January 6, 2022, covered text providers must provide the following location information with all 911 text messages routed to a PSAP: Automated dispatchable location, if technically feasible; otherwise, either end-user manual provision of location information, or enhanced location information, which may be coordinate-based, consisting of the best available location that can be obtained from any available technology or combination of technologies at reasonable cost." See 47 CFR § 9.10(q)(10)(v) and the FCC's webpage discussing location requirements for 911 texts at https://www.fcc.gov/911-dispatchable-location.

Question for Jill -is there a % specifically for NYS in terms of fee diversion? 5.68% doesn't seem like that much

The Commission found that the total amount diverted in 2021 nationwide was 5.68% of all 911 fees and charges collected by all states and jurisdictions. However, the Commission found that New York State itself diverted 41.7% of one 911-related fee it collected, or approximately $103 million. The Commission's Fourteenth Annual 911 Fee Report provides New York details on page 62 (Table 17) and pages 65-67. FCC, Fourteenth Annual Report to Congress on State Collection and Distribution of 911 and Enhanced 911 Fees and Charges (2022), https://www.fcc.gov/file/24628/download.

Jim Lake, Sam Gaither, and Matt Hibler:

Outstanding Questions

As a system, where does NG9-1-1 end? Does NG9-1-1 include dispatching and delivering information to the field, or does it end at delivering information to the dispatcher?

NG9-1-1 includes multiple aspects of 9-1-1, including call delivery, location services, and also signal delivery. All of these services will affect field responders in a positive way. However, if you are specifically referring to ESInets, then they end at the call answering location.

Can you provide a quick overview of your CAD-to-CAD program? No need to be very detailed, just curious how you are sending info electronically to reduce radio traffic?

We are in the crawl phase of our CAD-to-CAD project. We have created a SOW, and are reviewing the results. From there, we need to determine if we have an in-house vendor who can accomplish our goals, or do we need to go out to RFP. We are about to start sharing CFS locations, and apparatus locations via Alastar which is a situational awareness software that our Coastal Cooperative partners utilize.

TERT is a different acronym in the industry

Telecommunicator Emergency Response Team. Historically, we have thought about this being a group of dispatchers that physically drive down to assist another agency. We, however, intend to turn this concept on its proverbial head. With NG911, the Coastal ESInet Cooperative can assemble a group of trained dispatchers within an hour and set up a call center to back up nearly any PSAP that can transfer to us. We then have a couple of methods of getting calls back to the PSAP to get the calls for service dispatched via whatever method they still have working. In certain circumstances here in SC, with a few tweaks of our wireline radio consoles, we COULD dispatch for the agency in need.

Has the FCC issued any NOIs for these impairments?

Not that we know of.

Was location information delivered during these impairments?

It depends on what the problem was. During the evacuation, we told the system where to send the calls and location information was sent. During the outage, because it was a 911 outage, we did not get location information on our admin lines. Those centers with Rapid Deploy were able to see the wireless calls as they came in on their maps.

How long did it take to create a mock outage and who participated?

Our teams have spent several hours meeting and working to create and recreate scenarios, then hours testing and going back to the drawing board on items that didn't work. Remember, FAIL only means First Attempt In Learning. We learn something from all of our interactions and get better each time.

Who are the CHE vendors being used?

- Charleston – Intrado

- Berkeley – Intrado

- Horry – Frontier

- Beaufort – Vesta

- Town of Summerville – Intrado

- City of Goose Creek – Intrado

How is traffic being picked up from the OSPs? Where are the POIs?

We have two geographically POIs that sit between the providers and the geographic redundant INdigital ESRPs