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September 19, 2018

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: PS Docket No. 18-261 - In the Matter of Implementing Kari's Law and
Section 506 of RAY BAUM's Act
PS Docket No. 17-239 – In the Matter of Inquiry Concerning 911
Access, Routing, and Location in Enterprise Communications
Systems**

Dear Ms. Dortch:

On September 19, 2018, the undersigned, on behalf of the Voice on the Net Coalition (VON), spoke by telephone with Zenji Nakazawa, legal advisor to Chairman Ajit Pai. During the call, VON discussed the draft Notice of Proposed Rulemaking in the above-referenced dockets and asked the Commission to include the following three additional questions:

- a) Whether there are readily available location information sources (e.g., commercial location services) beyond the NEAD that can help to improve the potential for providing accurate and dispatchable location information?
- b) Whether there are standards-based approaches that could be taken to improve the technological capabilities of emergency calling (particularly as it expands beyond PSTN calls) while also improving the economics of enabling effective emergency calling? This question is intended to address concerns that the emergency calling system may not be ready for cloud-based and IP-based calling capabilities.
- c) The FCC should include a question about what other countries/regions are doing to address emergency calling challenges. This recognizes that

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emergency communications may originate from applications running on the Internet, that may be used from anyplace in the world, and that global standardization may be beneficial.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

By: _____ /s/
Glenn S. Richards
Counsel for VON

CC (*via email*): Zenji Nakazawa