

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)

Location-Based Routing)
For Wireless 911 Calls)

PS Docket 18-64

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net Coalition (“VON”)¹ respectfully submits these comments in response to the Commission’s Notice of Inquiry (“Notice”)² seeking comment on ways to more efficiently route a wireless 911 call to the appropriate public safety answering point (“PSAP”). In particular, the FCC asks whether emerging location-based technologies may be used by interconnected VoIP providers to automatically update or verify a user’s registered location.³ VON supports the Commission’s desire to improve the accuracy of routing 911 calls; however, much work remains to be done before location-based routing will be a viable option for all forms of mobile VoIP services.

Since 2003, VON and its members have been working closely with the Commission, state regulators and industry stakeholders to ensure the availability of 911 calling for customers using interconnected VoIP.⁴ Much progress has been made and today 911 access is a standard feature with VoIP calling. But VoIP has evolved as well, with the availability of mobile VoIP services facilitating calls through mobile applications on wireless handsets or through software available on desktops, laptops and tablets.

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of IP-enabled communications, including interconnected Voice over Internet Protocol (“VoIP”). For more information, see www.von.org.

² *In the Matter of Location-Based Routing For Wireless 911 Calls*, Notice of Inquiry, PS Docket 18-64 (rel. March 23, 2018).

³ *Notice* at 11.

⁴ See e.g., *First Report and Order and Notice of Proposed Rulemaking*, WC Docket Numbers 04-36 and 05-196 at 11 (rel. June 3, 2005) (“*VoIP 911 Order*”); VON Coalition ex parte, WC Docket No. 04-36 (filed May 12, 2005); Reply Comments of the Voice on the Net Coalition, PS Docket 17-239 (filed December 15, 2017).

Routing for mobile VoIP 911 calls may vary based on the device originating the call, the type of Internet access and the availability of a CMRS network. For example, VoIP 911 calls originating from wireless handsets will generally be routed by the subscriber's wireless carrier. If no wireless carrier network is available, or the 911 call originates from a device (such as a tablet or laptop) that may not be CMRS-enabled, the call will likely be routed by the VoIP provider's third party 911 service provider to a PSAP based on the registered location for the subscriber, in accordance with Commission requirements.⁵

In this proceeding, the Commission is examining whether location-based technologies may be used to provide more accurate 911 call routing by CMRS providers. Much of the discussion focuses on the recommendations found in a report issued in 2016 by the Communications Security, Reliability and Interoperability Council, which focuses primarily on wireless 911 calls.⁶ The report does not address the specific challenges faced by interconnected VoIP providers (and their third party 911 vendors) who may not have the same access to location information as CMRS providers.

Notwithstanding the challenges, it's likely that location-based technologies will provide more accurate and timely routing information for mobile VoIP 911 calls than the required registered location.⁷ By moving to a routing paradigm based on acquisition of a real-time location calculation, the FCC and industry standards bodies have the opportunity to significantly improve emergency calling services by routing mobile VoIP calls to a more appropriate PSAP. To the extent that location information can be used in a manner that rapidly and efficiently routes a 911 call to the most appropriate PSAP, VON believes there is great promise in leveraging these available technologies. There is much work to be done to effectuate a new emergency call routing paradigm, but the foundation is evident in the location capabilities available in the marketplace today.

⁵ See 47 CFR § 9.5(b)(2). While the FCC has sought comment on automatic location solutions for VoIP 911 calling, it has not required VoIP providers to implement any such solution. *Notice* at 15.

⁶ *Notice* at 7, citing Communications Security, Reliability and Interoperability Council V, Working Group 1, Evolving 911 Services, Final Report – Task 2: 911 Location-Based Routing (Sep. 2016), https://transition.fcc.gov/bureaus/pshs/advisory/csric5/WG1_Task2_FinalReport_092016.docx (*CSRIC V LBR Report*).

⁷ Importantly, during this time, to VON's knowledge, there have been few publicly reported complaints or incidents related to providers not complying with VoIP 911 rules.

Moreover, VON requests that the FCC take a broader view than simply the US market. While we recognize that the FCC's authority does not extend beyond the US, the FCC can be a leader by encouraging the use of available technologies through consistent technical standards developed across the globe. In a mobile-and-cloud-driven marketplace, challenges such as routing emergency calls do not stop at political borders. Consumers move freely across the planet and can access their services from just about anywhere they can find an Internet connection. Therefore, encouraging the industry to resolve these challenges through the standards-setting process will increase the likelihood of a more consistent approach that will protect American consumers whether they are at home or abroad.

CONCLUSION

VON members look forward to working with the Commission and industry stakeholders to advance routing solutions for 911 calls, as technological developments allow.

Respectfully submitted,

VOICE ON THE NET COALITION

/s/ Glenn S. Richards _____
Glenn S. Richards
Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth Street, NW
Washington D.C. 20036
(202) 663-8215
glenn.richards@pillsburylaw.com

Its Attorney

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