
NARUC E911 SURVEY OF COMPLIANCE WITH FCC VoIP ORDER

PRESENTATION BY:

STATE MEMBERS OF JOINT Federal/State VOIP Enhanced- 911 TASK FORCE
COMMISSIONER MAUREEN HARRIS
ROBERT MAYER

NARUC E911 TASK FORCE (LEGISLATIVE)
COMMISSIONER CONNIE HUGHES

NARUC SUMMER MEETINGS
SAN FRANCISCO JULY 2006



Agenda

- Introductions
- Summary of FCC VoIP/E911 Order
- Creation of Joint FCC/NARUC Task Force
- National Compliance Survey
- States Engagement with Public Safety Community (NENA/APCO)

In June 2005, the FCC Established Enhanced 911 rules that require all interconnected VoIP Service Providers to:

- ❑ Provide Enhanced 911 capabilities (caller's call back number and location) to their subscribers within 120 days
- ❑ Inform all subscribers of the limitations of VoIP E911 service (subscriber reported addresses, potential electric power problems, etc.)
- ❑ Maintain a record of affirmative acknowledgement from each of its VoIP subscribers of having received and understood the previously described advisory
- ❑ Distribute warning stickers or labels to all subscribers warning that their E911 service may be limited or unavailable

In July 2005 the FCC and NARUC formed the Joint Federal/State VoIP Enhanced 911 Enforcement Task Force to:

- Facilitate compliance with and enforcement of the FCC's VoIP 911 rules
- Develop outreach and education materials to ensure that consumers understand their rights and the requirements of the FCC's VoIP E911 Order
- Collect and compile implementation data
- Share best practices between the states
- Work with the public safety community to facilitate timely and effective enforcement of the VoIP/E911 rules
 - Association of Public Safety Communications Officials (APCO)
 - National Emergency Number Association (NENA)

Joint Federal/State VoIP Enhanced 911 Enforcement Task Force

■ State Representatives

- Robert Mayer (NY)
- Eddie Roberson (TN)
- Jeff Richter (WI)
- Steve Wilt (OK)
- Gary Klug (CO)

■ FCC Representatives

- Colleen Heitkamp
- Marcy Greene
- Sue McNeil
- Louis Sigalos
- Lyle Ishida
- Joe Casey
- Kathy Berthot
- Christi Shewman
- Michael Carowitz
- Lauren Patrich
- Julie Veach

TASK FORCE

ACCOMPLISHMENTS

- Developed a working relationship between FCC staff and states on critical E911 issues
- Established a dialog and working relationship with the Public Safety Community
- Monitored compliance activities throughout the US
- Engaged VoIP service providers (VSPs), VoIP Positioning Centers (VPCs), ILECS, and PSAP operators in compliance issues
- Developed website (voip911.gov)
- Worked with FCC staff to develop consumer outreach and education materials
- Developed and administered a national survey on VoIP compliance issues

SURVEY PURPOSE AND ADMINISTRATION

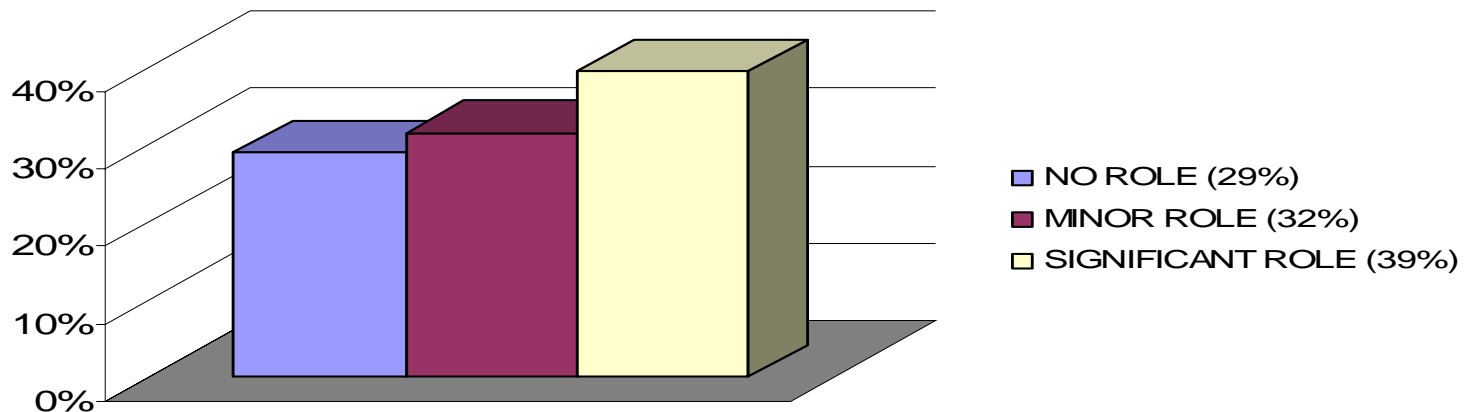
- Conduct a national survey on the status of VoIP/E911 experience on issues including:
 - State efforts to facilitate compliance with FCC Order
 - Communications difficulties
 - Connectivity issues
 - Operational problems
 - Liability concerns

Surveys sent to all 51 Public Utility Commissions, some State 911 Administrators, and other members of the 911 community. Responses received to date include 42 states and the District of Columbia.

EFFORTS TO FACILITATE COMPLIANCE WITH FCC ORDER

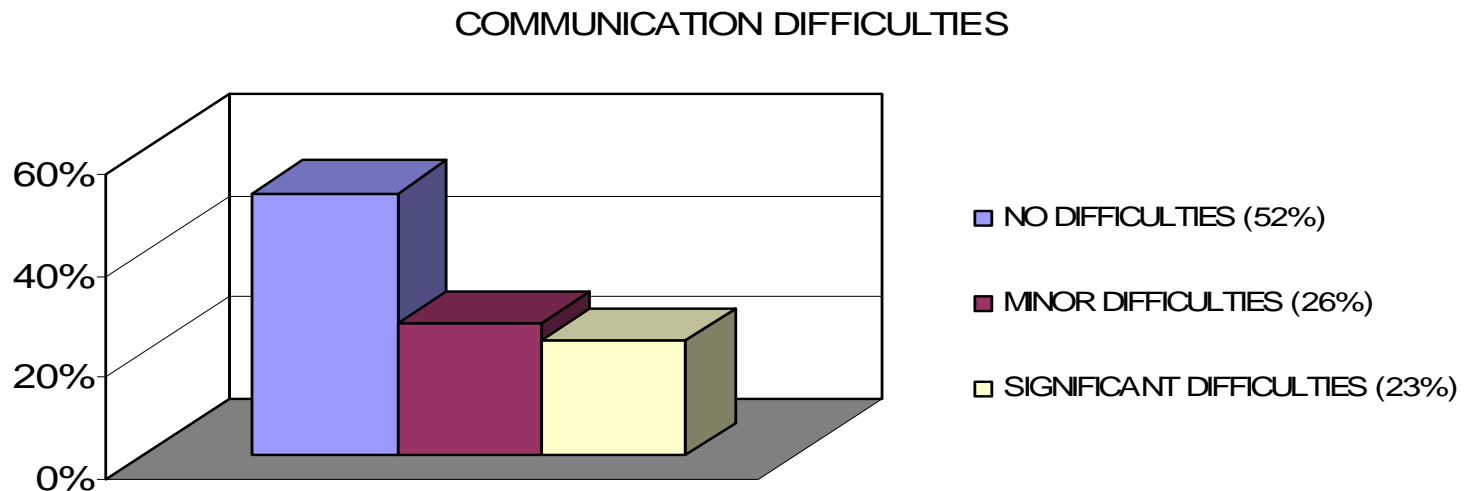
- Individual states took widely differing approaches to facilitate compliance with the FCC Order.
 - Of the states that responded to this question, 39% were significantly involved in the VoIP/e911 implementation efforts.

FACILITATION ROLE OF STATES

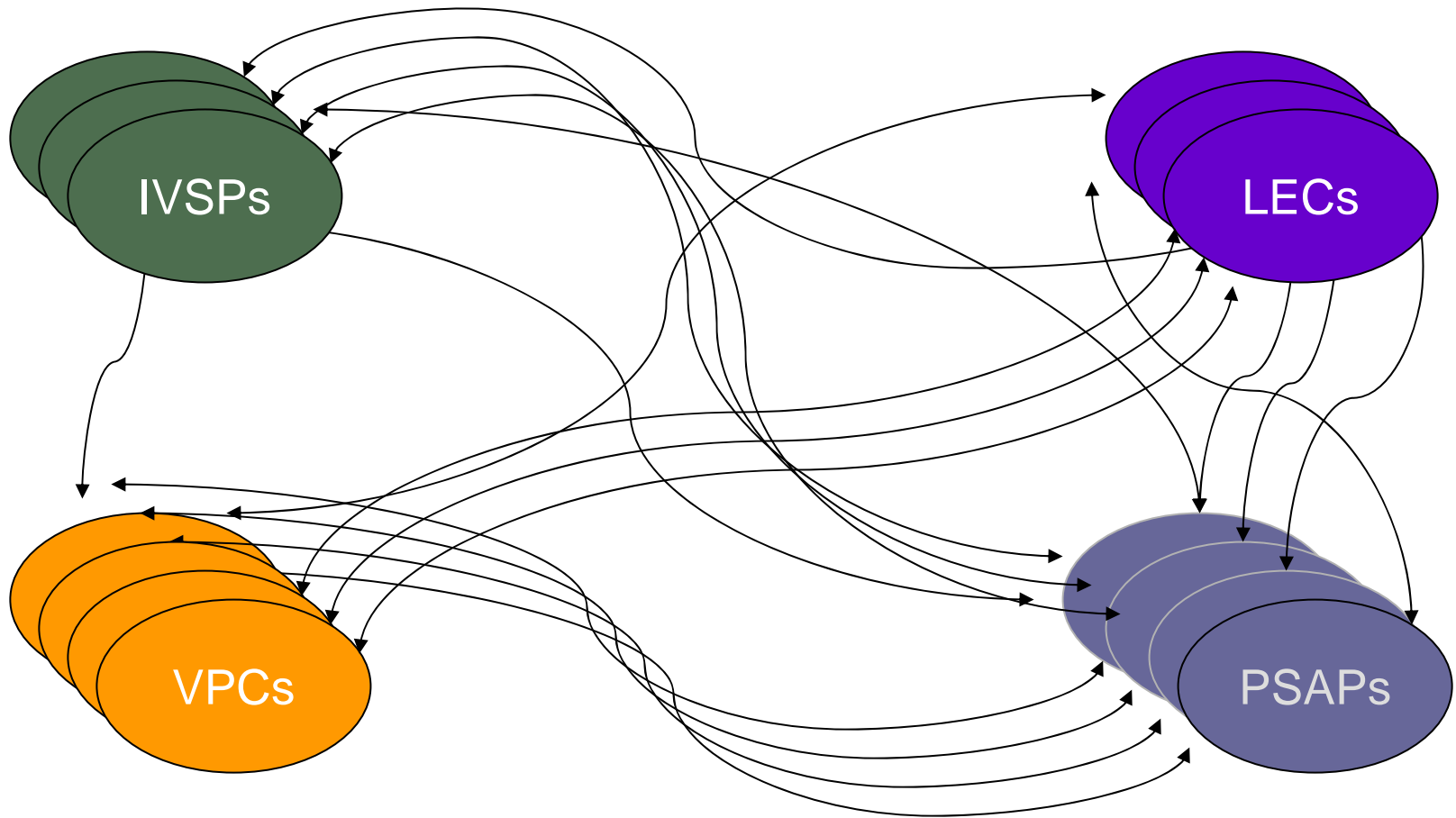


COMMUNICATIONS WITH RELEVANT PARTIES

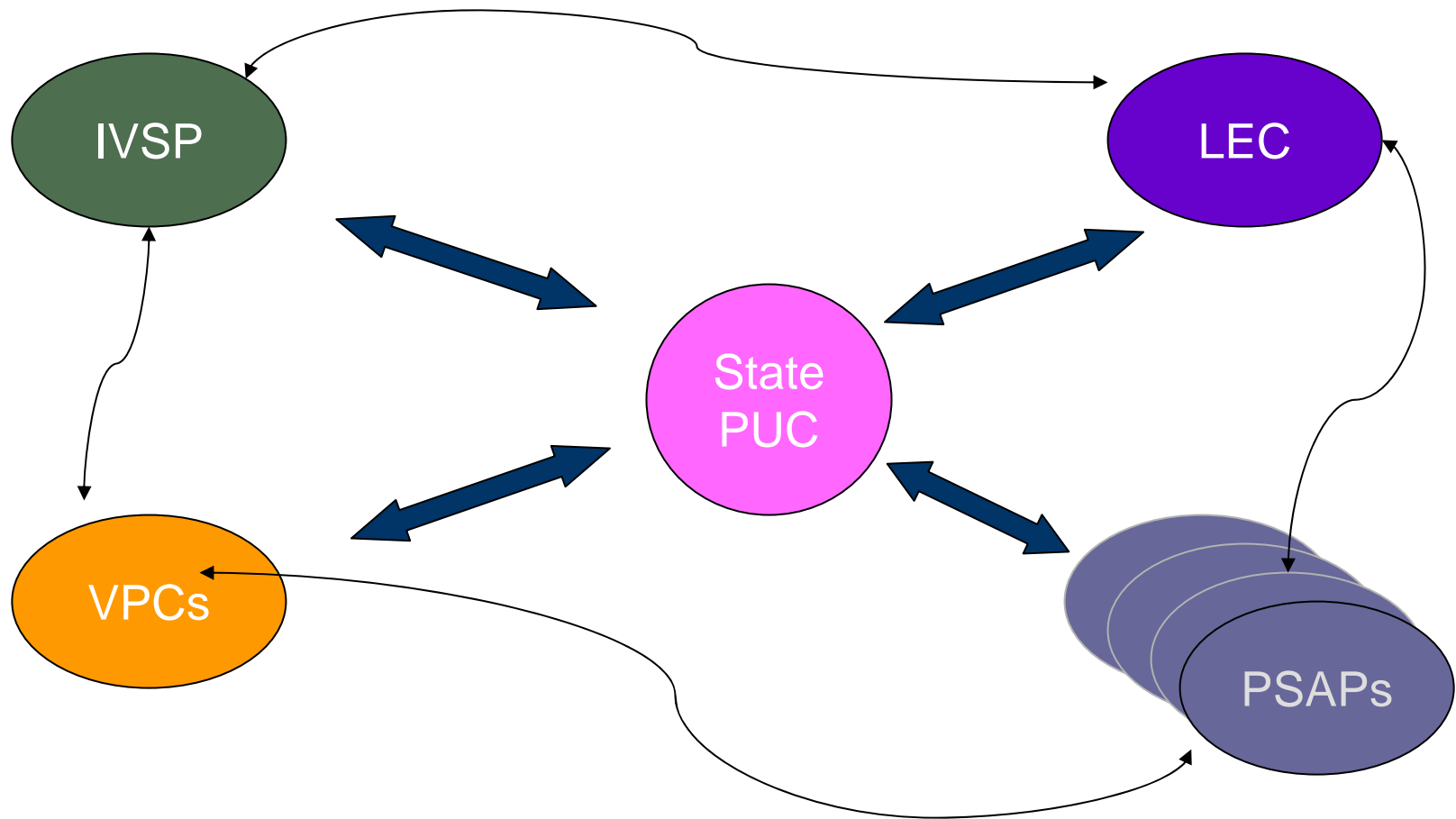
- Most states indicated that they are experiencing good communication and cooperation with some VSPs.
 - Of the states that responded to this question, 52% responded that they had no communication difficulties.



Communications permutations Xs 50



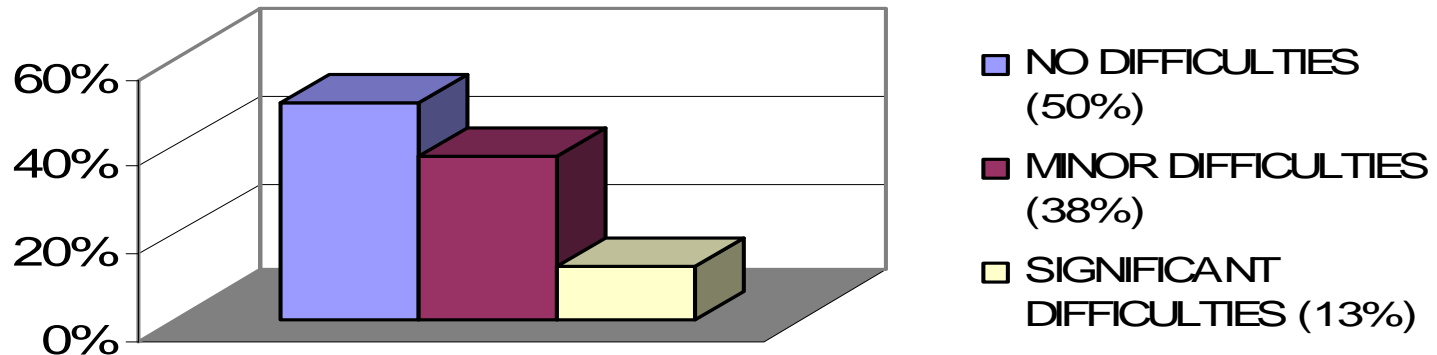
States Operate as Key Conduit



CONNECTIVITY

- Because of the many different configurations of E911 systems, responses regarding connectivity varied.
- In general, most of the connectivity issues have been resolved as most VSPs are utilizing existing selective routing connections through ILECs and CLECs.
- Many states reported that the ILECs are working cooperatively with the 911 agencies.

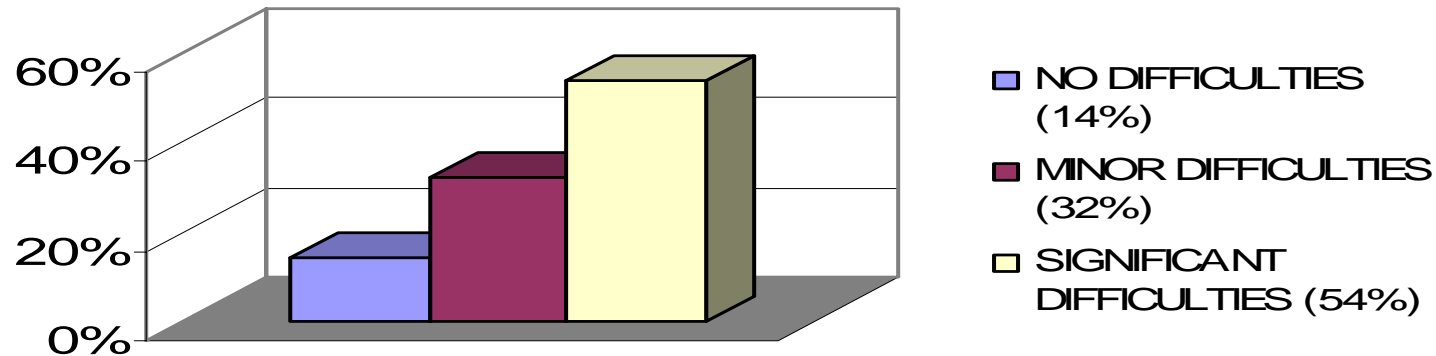
CONNECTIVITY DIFFICULTIES



OPERATIONS

- Regarding Operational Issues, most of the respondents indicated that the PSAPs had experienced significant difficulties implementing the FCC Order.

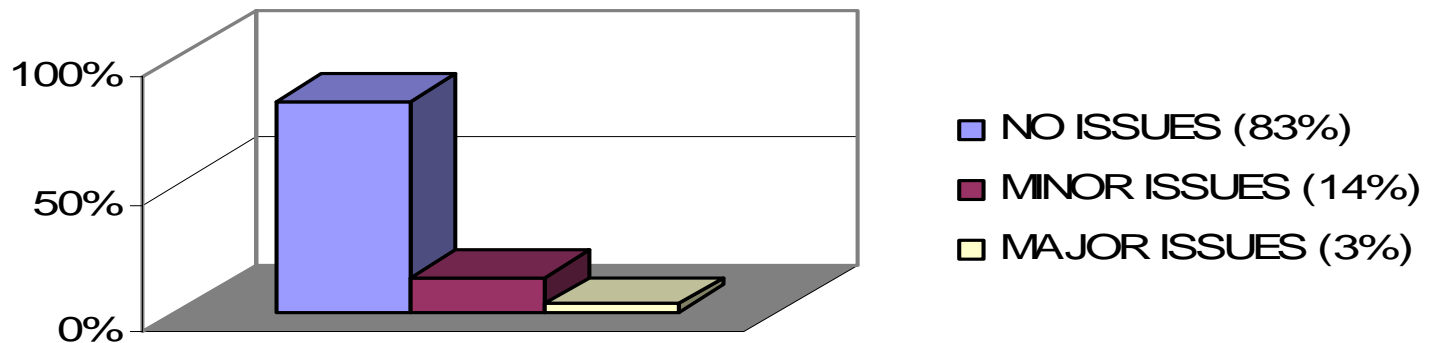
OPERATIONS RESPONSE



LIABILITY

- Most respondents did not have liability concerns.
- Some states provide liability protection for the PSAPs.

LIABILITY RESPONSE



OTHER ISSUES

- Issues not addressed by this survey but identified by respondents included the need to:
 - fund E911 services and collect fees from VSPs
 - develop thorough and accurate testing procedures
 - develop protocols for multiple ESN PSAPs
 - establish proper guidelines for Local Number Portability
 - develop standards for VSPs

What Have We Learned to Date?

- FCC Order has produced substantial compliance by VoIP Providers in record time.
- The Task Force has emerged as an important conduit for information sharing among stakeholders and an effective facilitator of implementation.
- The lack of uniform standards, roles and administration hampers the ability to apply broad solution templates.
- The states and state commissions must continue to play an important role in mandating the transition to next generation telecommunications services.