

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

In the Matter of)
)
Telecommunications Relay Services) CC Docket No. 98-67
and Speech-to-Speech Services for)
Individuals with Hearing and Speech)
Disabilities)

To: The Commission

REPLY COMMENTS OF APCO AND NENA

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") and the National Emergency Number Association ("NENA"), hereinafter referred to as "Joint Commenters," hereby submit the following reply comments in response to the Commission's Notice of Proposed Rulemaking ("Notice") in the above-captioned proceeding.

APCO is the nation's oldest and largest public safety communications organization. Most of its 13,000 individual members are state or local government officials involved in the management, design, and operation of police, fire, emergency medical, local government, highway maintenance, forestry conservation, disaster relief, and other public safety communications systems throughout the nation, including Public Safety Answer Points ("PSAPs") charged with answering and responding to 9-1-1 calls. Through its APCO Institute, APCO also develops and implements training programs for 9-1-1 center personnel .

NENA was established in 1982 as a not-for-profit corporation in order to further the goal of "One Nation ...One Number." It has 5,000 members in all 50 states, Canada, and other countries. NENA's mission is to foster the technological advancement, availability, and implementation of a universal emergency telephone number system. In carrying out its mission,

NENA promotes research, planning, training, and education.

The Joint Commenters support the comments filed by the Texas Advisory Commission on State Emergency Communications (“TX-ACSEC”),¹ which propose to establish standardized procedures for processing emergency calls at Telecommunications Relay Services (“TRS”) centers throughout the fifty states. One of the fundamental goals of APCO and NENA is to ensure that all telecommunications users have access to emergency services and that emergency calls are quickly and efficiently routed to PSAP operators. The Joint Commenters applaud the Commission’s decision to address our concerns about making emergency services directly accessible to individuals with hearing and speech disabilities. The lack of consistency among TRS providers in responding to emergency calls poses a threat to public safety, and Joint Commenters therefore support TX-ACSEC in the belief that the Commission should adopt minimum standards governing the procedures by which TRS providers handle emergency calls.

Joint Commenters agree with TX-ACSEC that all incoming emergency relay calls should be processed through an automated database system that matches the TRS callers automatic number information (“ANI”) with the appropriate emergency service number in his or her area. Automated database systems will significantly reduce the amount of time necessary for Calling Assistants (“CA”) to process emergency calls. Furthermore, the Commission should require telephone companies to share database information, including ANI and automatic location information (“ALI”), with TRS providers without proprietary restrictions. Sharing database information with TRS providers will permit CAs to quickly access a caller’s ANI/ ALI and to forward the information to the appropriate emergency PSAP.

¹ See Initial Comments of the Texas Advisory Commission on State Emergency Communications,

Joint Commenters recognize that some TRS centers and telecommunications providers do not currently have the technical capability to electronically pass a caller's ANI to an emergency PSAP. Until such time as automated database systems can be implemented, the Commission should require TRS providers to have access to regularly updated contact directories, indexed by city and country, when processing emergency calls. Requiring TRS centers to maintain updated contact directories, however, is not the final step in establishing standardized procedures for handling emergency TRS calls. Rather, the Commission should mandate the use of automated databases for processing TRS calls, at the earliest date technically feasible.

In defining what constitutes an "emergency" call, Joint Commenters agree with TX-ACSEC that the determination will vary from situation to situation and should be made based on the specific facts provided by the caller. However, in the event that a CA determines that a call is an emergency and should be connected to an emergency PSAP, all confidentiality regulations or TRS restrictions should be waived by the caller. Joint Commenters urge the Commission to adopt a provision whereby a caller is deemed to have provided "implied consent" for his or her ALI/ANI information to be transferred to an emergency PSAP, upon a CA's determination that the call constitutes an emergency situation. Granting implied consent on behalf of a caller will alleviate confusion among TRS providers about how to proceed in the event of an emergency call and will reduce possible confidentiality issues arising from the distribution of customer proprietary information

CONCLUSION

Therefore, for the reasons discussed above, we urge the Commission to move forward in adopting minimum standards to govern the procedures by which TRS centers process emergency calls. Minimum standards will eliminate the existing confusion among the states and TRS providers, and will promote the safety of individuals with hearing and speech disabilities.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY
COMMUNICATIONS OFFICIALS-
INTERNATIONAL, INC.

By:

Jack Keating, President

NATIONAL EMERGENCY NUMBER
ASSOCIATION

By:

Leah Senitte, President

Counsel for APCO:

Robert M. Gurss

Wilkes, Artis, Hedrick, & Lane, Chtd.

1666 K Street, N.W. #1100

Washington, D.C. 20006

(202) 457-7329

Counsel for NENA:

James R. Hobson

Donelan, Cleary, Wood & Maser, P.C.

1100 New York Ave., N.W. #750

Washington, D.C. 20005

(202) 371-9500

September 14, 1998