

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: Location-Based Routing for Wireless 911 Calls, PS Docket No. 18-64.

Today's item seeks information on the routing – and occasional re-routing – of wireless 9-1-1 calls to the appropriate public safety answering point, or PSAP, when location is based on cell tower location, and whether to consider switching the routing of 9-1-1 calls based on device location. A notice of inquiry seems completely appropriate, at this time, as the Commission would benefit from more information about the scope of the problem, to what extent misrouted calls are causing response delays for first responders, the state of location-based technologies, and whether the implementation of NG9-1-1 would mitigate such delays.

Going forward, it would be helpful to know whether any Commission action should be taken now or after NG9-1-1 upgrades. Generally, PSAP and wireless provider attention should be spent on upgrading the 9-1-1 system to the latest technologies that can solve many systemic problems. This is one of the reasons why I advocate so strongly against 9-1-1 fee diversion. Dollars diverted to other purposes limit available funding for upgrading equipment and staff training for next generation 9-1-1 communications and PSAPs. In fact, earlier this week, I visited the PSAP in Rhode Island, the second largest 9-1-1 fee diverting state, behind only New Jersey. While Rhode Island hopes to have text to 9-1-1 by the end of the year, there was no clear timeline when the PSAP would see real, robust NG9-1-1 capabilities, which is only possible when sufficient funding is available.

Additionally, these rerouting problems, central to today's item, are likely to be more prevalent along the boundaries of PSAPs. Therefore, I once again suggest that the Commission and the public safety community must examine the consolidation of PSAPs. While the exact numbers seem to fluctuate depending on the source, there are more than 5,783 PSAPs in the United States serving approximately 3,135 counties.¹ Not only would consolidation lead to certain efficiencies and reduce overall operational costs, but it would also lower the cost to upgrade to NG9-1-1 and decrease the instances where a call is misrouted to a neighboring PSAP.

¹ National Emergency Number Association, 911 Statistics, <https://www.nena.org/page/911Statistics> (last visited Mar. 22, 2018).