

Staff Workshop on 911 Reliability Certification

Public Safety & Homeland Security Bureau
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Disclaimer

- This presentation summarizes the ***911 Reliability Report and Order*** adopted by the Commission in December 2013.
 - The *Report and Order* is published at **28 FCC Record 17476** and available online at http://transition.fcc.gov/Daily_Releases/Daily_Business/2013/db1212/FCC-13-158A1.pdf.
 - Relevant rules are codified at **47 C.F.R. § 12.4**.
- The *Report and Order* reflects the Commission's official decision and supersedes the overview provided here. If in doubt, please consult the **actual text of the rules**.
 - Please direct any questions about interpretation of the rules to PSHSB staff and/or your legal counsel.

911 Reliability *Report and Order*

- ❑ Adopted in response to preventable 911 outages during **June 2012 derecho storm**
- ❑ **Covered 911 Service Providers** must take **reasonable measures** to provide reliable service, as evidenced by an **annual certification** of compliance with best practices or reasonable alternative measures.
 - **Critical 911 circuit diversity**
 - **Central office backup power**
 - **Diverse network monitoring**
- ❑ If a service provider relies on alternative measures or claims that a portion of the certification is not applicable to its network, it **must provide a brief explanation**.
- ❑ PSHSB has delegated authority to **administer certification process, develop and revise forms**, review certification information, and order remedial action if necessary.

Covered 911 Service Providers

- Any entity that:
 - **Provides 911, E911, or NG911 capabilities** such as call routing, automatic location information (ALI), automatic number identification (ANI), or the functional equivalent, directly to a public safety answering point (PSAP)
 - Does **not** include PSAPs or governmental authorities
 - Does **not** include communications providers that originate 911 calls where another provider delivers those calls and ALI/ANI to the appropriate PSAP
 - **Operates a central office that directly serves a PSAP**
 - A central office **directly serves a PSAP** if it hosts a selective router or ALI/ANI database, provides equivalent NG911 capabilities, or is the last service-provider facility through which a 911 trunk or administrative line passes before connecting to a PSAP.

Certification Elements: Critical 911 Circuit Diversity

- A Covered 911 Service Provider shall certify whether it has, within the past year:
 - **Conducted diversity audits of critical 911 circuits** or equivalent data paths to any PSAP served
 - **Critical 911 circuits** defined as facilities that originate at a selective router or its functional equivalent and terminate in the central office that serves a PSAP, including links to ALI/ANI databases
 - **Tagged critical 911 circuits** to reduce the risk of inadvertent loss of diversity between audits
 - **Eliminated all single points of failure** in critical 911 circuits or equivalent data paths serving each PSAP.
 - If not possible to eliminate single points of failure, the provider must include a brief explanation of **alternative measures or ongoing remediation**, the date by which it anticipates remediation will be completed, and why it believes those measures are reasonable under the circumstances
 - May respond that this section is **not applicable** if a provider does not operate any critical 911 circuits (e.g. provides a PSAP's 10-digit administrative lines but not its selective router(s) or location database(s))

Certification Elements: Central Office Backup Power

- With respect to any central office that directly serves a PSAP, a Covered 911 Service Provider shall certify whether it:
 - **Provisions backup power** through fixed generators, portable generators, batteries, and/or fuel cells to maintain full-service functionality, including network monitoring capabilities:
 - For at least **24 hours** if the central office directly serves a PSAP
 - For at least **72 hours** if the central office hosts a selective router
 - **Tests and maintains** backup power equipment in accordance with the manufacturer's specifications
 - Designs backup generators for **fully automatic operation** and for **ease of manual operation**, when required
 - Designs, installs, and maintains each generator in any central office that is served by more than one backup generator as a **stand-alone unit** that does not depend on the operation of another generator for proper functioning
 - May certify **alternative measures** or **non-applicability**, but must provide a brief explanation.

Certification Elements: Diverse Network Monitoring

- A Covered 911 Service Provider shall certify whether it has, within the past year:
 - **Conducted diversity audits** of its **aggregation points** for network monitoring data in each 911 service area and of the **monitoring links** between such aggregation points and its network operations center(s) (NOCS)
 - **911 service area** defined as the geographic region in which a Covered 911 Service Provider operates a selective router or the functional equivalent
 - **Implemented physically diverse aggregation points** for network monitoring data in each 911 service area and **physically diverse monitoring links** from such aggregation points to at least one NOC
 - If not possible to implement physically diverse aggregation points or monitoring links, the provider must include a brief explanation of **alternative measures or ongoing remediation**, the date by which it anticipates remediation will be completed, and why it believes those measures are reasonable under the circumstances
 - May respond that this section is **not applicable** if a provider does not operate a selective router or the functional equivalent (i.e. no “911 service area” to monitor)

Certification Information

- ❑ Materials submitted with a certification will be **presumed confidential** to the extent that they consist of:
 - Descriptions and documentation of alternative measures
 - Information detailing specific corrective actions
 - Supplemental information requested by the Commission or Bureau
- ❑ Fact of filing or not filing a certification and aggregated responses on the face of form **will not be treated as confidential**.
- ❑ Each certification must be submitted under penalty of perjury by a **corporate officer with supervisory and budgetary authority** over network operations in all relevant service areas.
- ❑ Service providers **encouraged to share relevant circuit audit records with PSAPs** on reasonable terms that protect confidentiality of proprietary information.

Status and Effective Dates

- Rules that do not require OMB approval (e.g. “reasonable measures” requirement) took effect **February 2014**.
- **Initial and annual certifications** involve a collection of information that must be approved by OMB.
 - OMB approval expected approximately **September 2014**.
 - Initial certification of at least 50-percent compliance with each element will be due **mid-2015**
 - Full annual certifications due **every year thereafter**
- **Petition for Reconsideration** filed February 2014 involving certification obligations of Next Generation 911 (NG911) providers and responsibility for auditing facilities leased from third parties
 - Petition is still pending
 - Comments should be filed in **PS Docket Nos. 13-75 and 11-60**