

***TC-1 Resolution on E911 Access and Enterprise Communications Systems***

*Whereas* the Federal Communications Commission (FCC) issued a Notice of Inquiry on September 26, 2017 at PS Docket No. 17-239 (“NOI”) entitled “Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems” requesting input on the technical capabilities, public expectations, and needs of public safety answering points regarding the E911 capabilities of Enterprise Communications Systems (“ECS”);

*Whereas* voluntary efforts among ECS manufacturers, installers, and operators are laudable, but may leave many 9-1-1 callers vulnerable;

*Whereas* the ability to dial 9-1-1 in an emergency is often the first and last resort for many individuals in the United States when requesting help in an emergency;

*Whereas* members of the public traveling for work or leisure cannot be expected to know the different requirements and capabilities of ECS from one State to the next;

*Whereas* requiring callers using ECS attempting to call 9-1-1 to dial an additional digit before dialing 9-1-1 may cause significant delays in reaching a Public Safety Answering Point (“PSAP”), when even minor delays can mean the difference between life and death for individuals calling 9-1-1;

*Whereas* individuals calling 9-1-1 from an ECS may not know their address or may be unable to verbally describe their location, either due to an existing disability, an acute medical condition, or because speaking out loud would compromise their safety;

*Whereas* an ECS that provides on-site notification of 9-1-1 calls may allow on-site personnel to implement procedures to direct first responders to the proper location rapidly and efficiently; *and* *Whereas* calls that are misrouted to the wrong PSAP require transferring, significantly delaying emergency response to the incident that prompted the call;

*Whereas* the FCC has historically shared jurisdictional authority over various portions of 9-1-1 telecommunications services matters with the States;

*Whereas* consistency, uniformity, and ubiquity of service is highly desirable in the dialing of 9-1-1; *now therefore be it*

*Resolved* that the National Association of Regulatory Utility Commissioners, convened at its 2017 Annual Meeting and Educational Conference in Baltimore, Maryland, supports federal and State actions to require ECS manufacturers, installers, and operators to design and configure ECS to allow direct dialing of 9-1-1, to route 9-1-1 calls to the proper PSAP regardless of the particular location of the extension used to call 9-1-1, provide the PSAP with location information specific and accurate enough for first responders to locate the caller, and to support on-site notification; *and be it further*

*Resolved* that any federal action should be mandatory for all ECS manufacturers, installers, and operators; *and be it further*

*Resolved* that federal requirements regarding ECS must not be written or implemented in such a way that it preempts States from imposing additional requirements as they see fit, presuming that such additional requirements do not contradict or conflict with federal requirements.

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*Sponsored by the Committee on Telecommunications*

*Recommended by the NARUC Board of Directors November 14, 2017*

*Adopted by the NARUC Committee of the Whole November 15, 2017*