



# PUBLIC NOTICE

Federal Communications Commission  
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**PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT ON REQUEST  
OF THE NATIONAL ASSOCIATION OF STATE 911 ADMINISTRATORS TO ADDRESS  
ISSUES RELATED TO 911 APPLICATIONS FOR SMARTPHONES**

**RM-11780**

**Comment Date: February 2, 2017**  
**Reply Comment Date: March 6, 2017**

The Public Safety and Homeland Security Bureau seeks comment on a request by the National Association of State 911 Administrators (NASNA) to initiate a proceeding to address issues related to how smartphone 911 applications (911 apps) interface with 911 systems.<sup>1</sup>

NASNA states that its members have had “real-world” experiences with 911 apps that “concern [them] greatly,” including: a 911 app that “enables the end-user to over-ride location information generated by the device and send a different location to 911”; a 911 app vendor that “published NASNA’s logo on its Website and promotional materials without permission, claiming NASNA has endorsed its product,” and other 911 app providers that have “briefed FCC and Department of Homeland Security staff, [placing] these agencies’ logos on their promotional material”; app providers making misleading claims that “911 location does not work from mobile phones,” “cellular technology is unreliable,” or that an app will “get help to [the end-user] faster and more reliably than simply calling 911”; and 911 apps that are not compatible with standard wireless 911 capabilities, such as one app that delivers 911 calls as VoIP calls for which “the normal wireless re-bid function cannot be performed when there is a need for more precise location.”<sup>2</sup>

Citing “the critical nature of 911 as the primary mechanism for the public to gain access to public safety services,” NASNA requests that the Commission consider initiating a proceeding to address “concerns regarding how these applications and services interface with existing 911 systems,” including: (1) ensuring that 911 apps “will not harm in any way how consumers currently access 911 service from a smartphone, including slowing down the process of gaining access to the 911 system” and do not “present a danger to emergency responders, or interfere or impede them in the process of responding to calls for service”; (2) prohibiting 911 apps from “overrid[ing] location information generated by the device and enabling location data to be ‘spoofed’ in a manner that displays information for the purposes of misleading the PSAP and first responders”; (3) ensuring that 911 apps “have been thoroughly tested to specific standards, including interoperability and downstream dispatching considerations”; (4) ensuring that “911 app providers are factually accurate in their marketing materials and do not mislead the public regarding how the product works,” do not mislead as to whether “a state, regional, or local 911

<sup>1</sup> Letter from Evelyn Bailey, Executive Director, National Association of State 911 Administrators, to Tom Wheeler, Chairman, FCC (October 18, 2016) (NASNA Letter). The letter is on file in RM-11780.

<sup>2</sup> *Id.* at 1.

governmental authority has approved, supports, or endorses, any particular product,” and do not inaccurately claim that “the lack of cellular or broadband coverage in any geographic area” is a failure of a 911 system; (5) ensuring that 911 apps will not “accidentally generate repeated pocket dialed 911 calls or 911 texts” or “generate duplicate requests for emergency assistance automatically”; (6) providing for “the development of specific standards for communicating and displaying supplemental consumer or incident information in the context of a 911 for dispatching purposes”; and (7) requiring that 911 apps adhere to “industry standards for the interconnection to [Next Generation] 911 systems and ensuring that 911 apps use appropriate public safety grade delivery networks and methods for message routing.”<sup>3</sup>

We seek comment on NASNA’s request and the appropriate role for the Commission. We also refer commenters to related issues raised in the workshop on 911 apps previously held by the Bureau,<sup>4</sup> and encourage commenters to submit information regarding other types of public safety-related smartphone apps, including apps designed to reach public safety answering points (PSAPs) that bypass the 911 system, campus safety apps, and apps that are designed to be integrated into PSAP networks.

### **Procedural Matters**

Pursuant to sections 1.415 and 1.419 of the Commission’s rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission’s Electronic Comment Filing System (ECFS). All comments must reference RM-11780. See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <http://apps.fcc.gov/ecfs/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission’s Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filings for the Commission’s Secretary must be delivered to FCC Headquarters at 445 12<sup>th</sup> St., SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12<sup>th</sup> Street, SW, Washington DC 20554.

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<sup>3</sup> See *id.* at 2-3.

<sup>4</sup> FCC, 911 Apps Workshop (May 8, 2015), <https://www.fcc.gov/news-events/events/2015/05/911-apps-workshop>.

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For further information regarding this matter, contact Austin Randazzo, Attorney Advisor, Policy and Licensing Division, Public Safety and Homeland Security Bureau at (202) 418-1462 or [Austin.Randazzo@fcc.gov](mailto:Austin.Randazzo@fcc.gov).

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