



# PUBLIC NOTICE

Federal Communications Commission  
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DA 20-1107

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**PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT ON GTA  
TELEGUAM HOLDINGS, INC. PETITION FOR WAIVER OF DISPATCHABLE LOCATION  
REQUIREMENTS FOR CALLS TO 911**

**PS Docket Nos. 18-261 and 17-239; GN Docket No. 11-117**

**Comment Date: October 19, 2020**

**Reply Comment Date: November 2, 2020**

The Public Safety and Homeland Security Bureau (Bureau) seeks comment from interested parties on the Petition for Waiver filed by GTA TeleGuam Holdings, Inc. (GTA).<sup>1</sup> GTA seeks a limited waiver of the requirement to furnish automated dispatchable location information with 911 calls from (1) multi-line telephone systems (MLTS); (2) fixed telephony; (3) Voice over Internet Protocol (VoIP); (4) Telecommunications Relay Services (TRS); and (5) mobile text.<sup>2</sup> Specifically, GTA seeks a waiver to the extent that 911 automated dispatchable location requirements apply to MLTS and the above-referenced services in “insular U.S. territories” where “single, official addresses do not exist.”<sup>3</sup> GTA states that in certain municipal villages in Guam, there is no single, official address for some locations, and there is “general disagreement over street address information.”<sup>4</sup> Consequently, GTA states, there is no single, official, and consistently recognized street address database that can be used to validate an individual street address in Guam.<sup>5</sup> GTA asserts that granting a limited waiver would not undermine the Commission’s policy objectives because GTA will continue to provide the Guam Public Safety Answering Point with an address with 911 calls, thereby allowing first responders to locate and access whoever is in need as quickly as possible.<sup>6</sup> GTA states that it collects its address information from the resident customer and GTA “consistently updates its own street address database and provides the Guam PSAP with the updated street address information bi-weekly”<sup>7</sup>

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<sup>1</sup> Petition of GTA for Waiver, PS Docket Nos. 18-261 and 17-239; GN Docket No. 11-117 (filed June 12, 2020), <https://ecfsapi.fcc.gov/file/1061297232821/Final%20GTA%20Kari's%20Law%20Waiver.pdf> (Petition).

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

<sup>3</sup> *Id.* at 2.

<sup>4</sup> *Id.* at 3.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at 6.

<sup>7</sup> *Id.* at 7.

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 above. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS). All comments must reference PS Docket Nos. 18-261 and 17-239 and GN Docket No. 11-117.<sup>8</sup>

- 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.
- Filings can be sent 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.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.
- Effective March 19, 2020, and until further notice, the Commission no longer accepts any hand or messenger delivered filings. This is a temporary measure taken to help protect the health and safety of individuals, and to mitigate the transmission of COVID-19.<sup>9</sup>
- During the time the Commission's building is closed to the general public and until further notice, if more than one docket or rulemaking number appears in the caption of a proceeding, paper filers need not submit two additional copies for each additional docket or rulemaking number; an original and one copy are sufficient.
- People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (tty).

*Ex Parte Rules.* The proceeding this petition initiates shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.<sup>10</sup> Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission

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<sup>8</sup> See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

<sup>9</sup> See *FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Policy*, Public Notice, DA 20-304 (March 19, 2020). <https://www.fcc.gov/document/fcc-closes-headquarters-open-window-and-changes-hand-delivery-policy>

<sup>10</sup> 47 CFR §§ 1.1200 *et seq.*

staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

*Additional Information.* For further information regarding this Notice, please contact John A. Evanoff, Deputy Chief, Policy and Licensing Division, Public Safety and Homeland Security Bureau, 202-391-9017 or by email to [John.Evanoff@fcc.gov](mailto:John.Evanoff@fcc.gov).

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