



PUBLIC NOTICE

Federal Communications Commission
45 L Street NE
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <https://www.fcc.gov>
TTY: 1-888-835-5322

DA 21-465

Released: April 21, 2021

WIRELINE COMPETITION BUREAU AND WIRELESS TELECOMMUNICATIONS BUREAU SEEK COMMENT ON FACILITATING ACCESS TO 211 VIA WI-FI CALLING

Bureaus Also Seek Comment on Wi-Fi Calling to 988 and Other Non-911 N11 Codes

CC Docket No. 92-105, WC Docket No. 18-336, WC Docket No. 21-180

Comments Due: May 21, 2021

Reply Comments Due: June 7, 2021

In this Public Notice, the Wireline Competition Bureau and Wireless Telecommunications Bureau (together, the Bureaus) seek comment on the opportunities and challenges associated with providing the public with access to essential community services through 211, the three-digit dialing code for community information and referral services, using Wi-Fi calling technologies.¹

The Commission recognized the importance of community information and referral services when it designated 211 in 2000, explaining that “[i]ndividuals facing serious threats to life, health, and mental well being have urgent and critical human needs that are not addressed by dialing 911 . . . or . . . non-emergency police assistance.”² Among other things, 211 offers referrals to food and clothing banks, medical information lines, transportation and housing assistance, and support for persons with disabilities.³ As communities face numerous challenges during the COVID-19 pandemic, these services are more vital than ever.

Recently, the FCC has explored improvements in the provision of voice and broadband connectivity over Wi-Fi that could be leveraged to support access to emergency 911 services.⁴ While further study is needed, it is possible these improvements could also lead to Wi-Fi solutions that could expand options for consumers to connect to non-emergency services like 211 as well. This is desirable because Wi-Fi calling technology enables people to place calls from their mobile devices even when

¹ Wi-Fi, or “wireless fidelity,” “connects end-user devices to . . . a local Internet service via short-range wireless technology.” FCC, *Getting Broadband Q&A* (Feb. 5, 2020), <https://www.fcc.gov/consumers/guides/getting-broadband-qa>.

² *The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket No. 92-105, Third Report and Order and Order on Reconsideration, 15 FCC Rcd 16753, 16764, para. 18 (2000) (*N11 Third Report and Order*).

³ FCC, *Dial 211 for Essential Community Services* (Dec. 31, 2019), <https://www.fcc.gov/consumers/guides/dial-211-essential-community-services>.

⁴ Public Safety and Homeland Security Bureau, *Study on Emergency 911 Access to Wi-Fi Access Points and Spectrum for Unlicensed Devices When Mobile Service is Unavailable* (Mar. 23, 2021), <https://docs.fcc.gov/public/attachments/DOC-371031A1.pdf> (911 Wi-Fi Report).

outside of their cellular networks.⁵ Wi-Fi calling includes calls made over Wi-Fi through either a wireless provider's network or an over-the-top voice over Internet Protocol communication service.⁶ Wi-Fi calling can be particularly useful where cellular service is not available, for example, in some rural areas.⁷

Accordingly, we invite interested parties to provide comments on the opportunities and challenges associated with leveraging Wi-Fi calling technologies to support access to 211 and other essential community services, and we seek comment on the public interest benefits of doing so.⁸ Indeed, we note that both the number of calls to 211 and the number of calls being made over Wi-Fi both have increased significantly over the past year.⁹

We also seek to better understand the public's ability to connect to these essential community services using Wi-Fi calling today. We recognize that when the Commission designated 211 for nationwide community information and referral services more than 20 years ago, most American consumers called 211 over traditional landline telephones and reached their local 211 call centers over circuit-switched networks.¹⁰ Today, however, more consumers have cell phones than landline telephones, so many consumers attempt to reach 211 services with mobile devices over either their wireless provider's cellular network or a public or private Wi-Fi network. Accordingly, we seek comment on the extent to which consumers are able to use Wi-Fi calling today to reach 211 services. Do any service providers make 211 service available through Wi-Fi calling, and if so, what factors do service providers consider in making 211 service available through Wi-Fi calling? To what extent are handsets set up to dial 211 over Wi-Fi? In what circumstances do calls to 211 over Wi-Fi fail to connect or fail to connect to a call center that serves the caller's location? In addition to the service providers offering mobile wireless service to their customers, what role do other stakeholders in the communications ecosystem (such as over-the-top application providers or Wi-Fi access point providers) have in facilitating consumer access to 211 service through Wi-Fi calling?

Further, we seek comment on the different types of Wi-Fi calling, and how they affect consumers' ability to reach 211 call centers. How does a wireless provider's network infrastructure affect 211 accessibility through Wi-Fi calling? We also seek comment on potential challenges facing consumers when dialing 211 through Wi-Fi calling. For example, does a consumer's wireless service contract status (e.g., monthly, prepaid, expired) or the state they reside in affect their ability to reach 211? Additionally, we seek comment on issues pertaining to 211 infrastructure and Wi-Fi calling generally. Can 211 call centers recognize or accept Wi-Fi calls, and if so, to what extent has volume and compatibility changed over the past year? Are there other factors to consider?

We seek comment on the technical feasibility, cost, and other operational considerations of providing access for 211 services over Wi-Fi technologies. Are there other means that could be used to

⁵ 911 Wi-Fi Report at para. 14 & n.21.

⁶ See Maggie Tillman, *What is Wi-Fi Calling and how can you activate it?* (Mar. 25, 2020), <https://www.pocket-lint.com/phones/news/133829-what-is-wi-fi-calling-and-which-devices-support-it>; Digital Trends, *What is Wi-Fi calling, and how does it work?* (Mar. 21, 2021), <https://www.digitaltrends.com/computing/what-is-wi-fi/>.

⁷ See 911 Wi-Fi Report at para. 14 & n.21.

⁸ See generally Letter from Kirsten Gillibrand, United States Senator, New York, Bernard Sanders, United States Senator, Vermont, and Robert P. Casey, Jr., United States Senator, Pennsylvania, to Acting Chairwoman Rosenworcel, FCC (Mar. 22, 2021) (Senators Letter); Letter from June E. Tierney, Commissioner, State of Vermont Department of Public Service, to Acting Chairwoman Rosenworcel, FCC (Apr. 1, 2021).

⁹ See Senators Letter at 1-2.

¹⁰ *N11 Third Report and Order*, 15 FCC Rcd at 16766, para. 21.

provide access to 211 services when cellular networks are unavailable? We seek comment on these alternative means to facilitate such access.

Finally, we seek comment on opportunities to make other non-911 N11 services beyond 211 available over Wi-Fi.¹¹ In designating 988 as the three-digit code for accessing the National Suicide Prevention Lifeline beginning July 16, 2022, the Commission adopted rules specifically requiring interconnected VoIP providers, including one-way VoIP providers, to implement 988 in their networks.¹² As such, we seek comment on the future availability of 988 over Wi-Fi calling. Are covered providers working to make 988 available over Wi-Fi? We generally seek comment on how calling to three-digit dialing codes, other than 911, through Wi-Fi calling compares and contrasts to calling 911 through Wi-Fi calling.¹³

Filing Requirements. Pursuant to section 1.419 of the Commission's rules, 47 CFR § 1.419, interested parties may file comments on or before **May 21, 2021**, and reply comments on or before **June 7, 2021**. All filings should refer to WC Docket No. 21-180, WC Docket No. 18-336, and CC Docket No. 92-105. Filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission. Comments may be filed by paper or by using the Commission's Electronic Comment Filing System (ECFS). See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Comments and replies may be filed electronically via ECFS: <http://www.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.¹⁴
- 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 45 L St, NE, 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

¹¹ In addition to 211 and 911, the Commission has designated 311 for non-emergency police services, 511 for traveler information services, 711 for the Telecommunications Relay Service, and 811 for notice of excavation activities. The remaining N11 codes, 411 and 611, have not been permanently assigned by the Commission, but are used for directory assistance and wireline and wireless carrier customer service and repair, respectively. See Wireline Competition Bureau and Office of Economics and Analytics, *Report on the National Suicide Hotline Improvement Act of 2018* at 5 (Aug. 14, 2019), <https://docs.fcc.gov/public/attachments/DOC-359095A1.pdf> (internal citations omitted).

¹² 47 CFR § 52.200(a), (e)(1); *Implementation of the National Suicide Hotline Improvement Act of 2018*, WC Docket No. 18-336, Report and Order, 35 FCC Rcd 7373, 7393, para. 38 (2020).

¹³ See generally PSHSB, *Study On Emergency 911 Access To Wi-Fi Access Points And Spectrum For Unlicensed Devices When Mobile Service Is Unavailable* (rel. Mar. 23, 2021), <https://docs.fcc.gov/public/attachments/DOC-371031A1.pdf>.

¹⁴ In response to the COVID-19 pandemic, the FCC has closed its current hand-delivery filing location at FCC Headquarters. We encourage outside parties to take full advantage of the Commission's electronic filing system. Any party that is unable to meet the filing deadline due to the building closure may request a waiver of the comment or reply comment deadline, to the extent permitted by law.

safety of individuals, and to mitigate the transmission of COVID-19. See FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Policy, Public Notice, 35 FCC Rcd 2788 (OS 2020). <https://www.fcc.gov/document/fcc-closes-headquarters-open-window-and-changes-hand-delivery-policy>.

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 or call the Consumer & Governmental Affairs Bureau at (202) 418-0530 (voice) or (202) 418-0432 (tty).

Ex Parte Rules. Proceedings in this Notice shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission’s *ex parte* rules.¹⁵ 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 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 these proceedings should familiarize themselves with the Commission’s *ex parte* rules.

For further information, please contact Jesse Goodwin, Attorney Advisor, Competition Policy Division, Wireline Competition Bureau at (202) 418-0958 or by email at Benjamin.Goodwin@fcc.gov, and Georgios Leris, Acting Associate Division Chief, Competition and Infrastructure Policy Division, Wireless Telecommunications Bureau at (202) 418-1994 or by email at Georgios.Leris@fcc.gov.

- FCC -

¹⁵ See 47 CFR §§ 1.1200(a), 1.1206.