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PUBLIC SAFETY AND HOMELAND SECURITY BUREAU REMINDS CMRS PROVIDERS USING SUPPLEMENTAL COVERAGE FROM SPACE OF THE OCTOBER 15, 2025 DEADLINE FOR FILING 911 REPORTS AND CERTIFICATIONS

GN Docket No. 23-65; IB Docket No. 22-271; PS Docket No. 24-318

The Public Safety and Homeland Security Bureau (Bureau) reminds Commercial Mobile Radio Service (CMRS) providers using supplemental coverage from space (SCS) arrangements of their obligation to file annual reports by **October 15 of each year** regarding 911 voice calls, text messages, and emergency call center data. In addition, CMRS providers must certify on a one-time basis that they will protect the privacy and security of location information used to comply with the part 9 SCS rules. CMRS providers must submit this one-time certification by the **due date of their first annual 911 report for SCS**. Both the annual report and one-time certification must be filed via the Commission's Electronic Comment Filing System (ECFS) in **PS Docket No. 24-318**.

The Commission adopted these reporting requirements in 2024 as part of interim 911 requirements for terrestrial providers that use SCS arrangements to extend their coverage service areas.⁵ These interim 911 rules are codified at 47 CFR § 9.10(t).⁶

Below we provide additional information on these annual reports and one-time privacy certifications.

Annual Reports. Annual reports must include, at a minimum, the following information:

- The name and address of the CMRS provider;
- The address (zip code only) of the CMRS provider's emergency call center and the contact information (telephone number and/or email address) of the emergency call center. To avoid

¹ 47 CFR § 9.10(t)(3).

² 47 CFR § 9.10(t)(4).

³ *Id*.

⁴ 47 CFR § 9.10(t)(3)-(4).

⁵ See Single Network Future: Supplemental Coverage from Space; Space Innovation, GN Docket No. 23-65, IB Docket No. 22-271, Report and Order and Further Notice of Proposed Rulemaking, 39 FCC Rcd 2622 (2024).

⁶ 47 CFR § 9.10(t). These rules became effective on October 7, 2024, when the Office of the Federal Register published a notice announcing Office of Management and Budget (OMB) approval of the information collection requirements contained in the interim 911 rules for SCS. See 89 Fed. Reg. 81013 (October 7, 2024); see also Public Safety And Homeland Security Bureau Announces Office Of Management And Budget Approval For 911 Information Collection Requirements Associated With Supplemental Coverage From Space, GN Docket No. 23-65, IB Docket No. 22-271, PSHSB Docket No. 24-318, Public Notice, 39 FCC Rcd 11005 (PSHSB 2024) (announcing OMB approval and providing guidance on information collection requirements).

publicly disclosing potentially sensitive information, CMRS providers should refrain from providing specific locations such as street addresses or building names;

- The aggregate number of SCS 911 voice calls and SCS 911 text messages received by the network of the CMRS provider that provides SCS service to its end-user subscribers during each month during the relevant reporting period;
- The aggregate number of SCS 911 voice calls and SCS 911 text messages received by the emergency call center each month during the relevant reporting period;
- The aggregate number of SCS 911 voice calls and SCS 911 text messages received by the
 emergency call center each month during the relevant reporting period that required
 forwarding to a Public Safety Answering Point (PSAP) and how many did not require
 forwarding to a PSAP;
- The aggregate number of SCS 911 voice calls that were routed using location information that met the timeliness and accuracy thresholds defined in Section 9.10(s)(3)(i)(A) and (B) of the Commission's rules;⁷
- The aggregate number of SCS 911 voice calls and SCS 911 text messages that were routed using location information that did not meet the timeliness and accuracy thresholds defined in Section 9.10(s)(3)(i)(A) and (B) of the rules;⁸ and
- An explanation of how the SCS deployment, including network architecture, systems, and procedures, will support routing SCS 911 voice calls and SCS 911 text messages to the geographically appropriate PSAP with sufficient location information in compliance with Section 9.10(t)(2) of the rules.⁹

The report must be current as of September 30 of the filing year. This means that if a CMRS provider begins using SCS arrangements after September 30 of a given year, it does not have to file an annual report by October 15 of that year. The report will be due by October 15 of the following year.

There is no required form for the submission of annual reports. CMRS providers may submit their completed reports with a cover letter which includes the date of submission; name of CMRS provider; and name and contact information of person submitting the report when filing via ECFS in **PS Docket No. 24-318**.

One-Time Privacy Certification. CMRS providers must certify on a one-time basis that neither they nor any third party they rely on to obtain location information or associated data used for compliance with Section 9.10(t)(2)(i) or (ii) of the rules will use such location information or associated data for any non-911 purpose, except with prior express consent or as otherwise permitted or required by law.¹⁰ The certification also must state that the CMRS provider and any third party it relies on to obtain location information or associated data used for compliance with Section 9.10(t)(2)(i) or (ii) of the rules have implemented measures sufficient to safeguard the privacy and security of such location information or associated data.¹¹

⁷ 47 CFR § 9.10(s)(3)(i)(A), (B).

⁸ *Id*.

⁹ 47 CFR § 9.10(t)(2).

¹⁰ Id

¹¹ *Id*.

CMRS providers must submit this one-time certification by the due date of their first annual 911 report under the SCS rules.¹² The one-time certification must be filed via ECFS in the same docket as the annual reports, **PS Docket No. 24-318**.

For further information, please contact Zachary DiLeo, Attorney Advisor, Policy and Licensing Division, Public Safety and Homeland Security Bureau at (202) 418-0617 or zachary.dileo@fcc.gov.

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 $^{^{12}}$ 47 CFR § 9.10(t)(4). To illustrate this, if a CMRS provider files its first annual report on Oct. 15, 2026, the one-time certification would be due by that date.