

**SEPARATE STATEMENT OF  
COMMISSIONER JONATHAN S. ADELSTEIN**

*Re: In re Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911  
Emergency Calling Systems; CC Docket No. 94-102*

There is no higher calling or higher priority for us at the Commission than improving 911 and enhanced 911 (E911) emergency response services. Every day, we confront issues that have millions of dollars at stake; but nothing we do is more important than 911 and E911 services. Unlike a lot of issues we handle that get so much attention, this literally is a matter of life or death.

The Commission always can do more to support the rollout of E911. In my view, we can never do enough. And we have made great strides during the last year: by continuing to provide solid regulatory guidance; by improving our level of collaboration with legislators on Capitol Hill, including the leadership of the Congressional E911 Caucus; and through two very well-organized E911 Coordination Initiatives, which were held right here in the Commission meeting room.

We continue these outstanding efforts today by providing a comprehensive review of our rules to determine the applicability of E911 requirements to a number of different technologies and services. I believe that the item strikes the right balance in imposing obligations on these services, in that it continues our work to make emergency response better and faster in America through the use of both improved 911 and E911 services but also recognizes the unique technical and service characteristics of the different offerings.

That is why I am particularly pleased that we adopt a measured approach to those telematics providers providing call-center based services, which are not also available with commercial mobile wireless service. These companies are offering their subscribers a service with very real public benefits. There is no reason to impose regulation on these services, given their success and collaboration with the public safety community to date.

I also am pleased with our decision to require MSS carriers to establish call centers for the purpose of answering 911 emergency calls. Rightly, we also put these same carriers on notice that we ultimately intend to require them to comply with our E911 requirements, though the record, at this time, does not support immediate compliance with those rules.

Finally, I do have a lingering concern that our actions today with regard to Multi-Line Telephone Systems (MLTS), such as private branch exchanges (PBXs), just are not enough. Consequently, I regard our action today as simply a first step, and I am very pleased with our decision to continue our review in this important area through a Further Notice. It cannot be emphasized enough how critical it is that state and local governments adopt rules requiring MLTS E911 implementation, such as the model legislation suggested by APCO and NENA. I am fully prepared to intervene should we not see the timely adoption of these important requirements.