

FCC FACT SHEET*
Modernizing the 911 Framework
Notice of Inquiry – PS Docket No. 26-197

Background: Our nation’s 911 system plays a vital role every day in saving lives, protecting property, and connecting people with needed emergency assistance. As new communications technologies, services, and platforms emerge, they allow the public to reach 911 in more ways than ever before, but they also raise questions about the continued effectiveness of traditional approaches to 911 regulation. The Notice of Inquiry (*Notice*) would initiate a comprehensive examination of the Commission’s 911 framework in an era of rapid technological change. It would invite stakeholders to look beyond the 911 system of today, consider how new technologies and services could reshape 911, and provide input on how the Commission can best adapt its approach to meet public safety needs and consumer expectations in the years ahead.

What the *Notice* Would Do:

- Examine the core objectives of the 911 framework and how to apply these objectives to the next generation of communications technologies and platforms.
- Explore modernizing the Commission’s decades-old “911 scope” analysis used to determine whether new technologies and services should be subject to the Commission’s 911 framework.
- Investigate opportunities to harmonize 911 requirements across traditionally separate service categories.
- Inquire how the Commission’s legal authority to regulate 911 applies in the evolving modern communications ecosystem.

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Modernizing the 911 Framework

PS Docket No. 26-197

NOTICE OF INQUIRY*

Adopted: []

Released: []

Comment Date: November 16, 2026
Reply Comment Date: December 15, 2026

By the Commission:

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I. INTRODUCTION

1. With this Notice of Inquiry (*Notice*), we launch a comprehensive examination of our 911 framework in light of rapidly emerging new technologies to ensure the public can continue to effectively and reliably access emergency services in a way that is consistent with consumer expectations. Our nation’s 911 system plays a vital role every day in saving lives, protecting property, and connecting people with needed emergency assistance. Over the years, we have adopted rules to ensure that communications service providers support 911 connectivity, routing, and location. More recently, we have taken action to advance 911 reliability and the transition to Next Generation 911 (NG911). We

* This document has been circulated for tentative consideration by the Commission at its September 30, 2026 open meeting. The issues referenced in this document and the Commission’s ultimate resolution of those issues remain under consideration and subject to change. This document does not constitute any official action by the Commission. However, the Chairman has determined that, in the interest of promoting the public’s ability to understand the nature and scope of issues under consideration, the public interest would be served by making this document publicly available. The Commission’s *ex parte* rules apply and presentations are subject to “permit-but-disclose” *ex parte* rules. *See, e.g.*, 47 CFR §§ 1.1206, 1.1200(a). Participants in this proceeding should familiarize themselves with the Commission’s *ex parte* rules, including the general prohibition on presentations (written and oral) on matters listed on the Sunshine Agenda, which is typically released a week prior to the Commission’s meeting. *See* 47 CFR §§ 1.1200(a), 1.1203.

remain strongly committed to these objectives. At the same time, we also believe that advances in technology and new and emerging modes of communication require us to look beyond the 911 system of today and consider what 911 could become to meet public safety needs and consumer expectations in the future. Against this backdrop, this *Notice* focuses on reexamining the assumptions that have guided 911 to date and exploring considerations that will enable 911 to evolve alongside technology and changes to communications infrastructure.

2. The nation's communications ecosystem is undergoing a dramatic transformation that prompts us to re-examine how we approach 911 for new services, technologies, devices, and platforms. Consumers make 911 calls from an increasing number of platforms and endpoints, a capability which requires the coordinated performance of networks, software, devices, and other technologies. Public safety's transition to NG911 and the broader transition to Internet Protocol (IP) networks are reshaping the ways emergency communications are initiated, transmitted, and processed. Much of the Commission's current 911 framework was developed in a communications environment that was characterized by relatively distinct service categories, dedicated legacy network architectures, and voice-centric emergency communications. The modern 911 ecosystem, however, is becoming more diverse and data-driven, raising questions about the continued effectiveness of historical regulatory approaches. In this Notice, we seek comment on:

- The enduring core objectives of the 911 framework;
- The Commission's longstanding four-factor 911 scope analysis;
- Harmonizing 911 obligations across services and technologies; and
- How the Commission's existing legal authorities shape our policies.

Together, these inquiries will help us establish a principled and durable basis for making future 911 policy decisions in the new communications landscape.

II. BACKGROUND

3. *The 911 framework.* The Commission requires wireline, wireless, and other originating service providers (OSPs)¹ to take basic steps to facilitate emergency response. As a general matter, these providers must transmit and route 911 calls from consumers to the appropriate public safety answering point (PSAP) with location information and a callback number.² Local jurisdictions typically operate the PSAPs that answer 911 calls, making appropriate transmission and routing critical to avoid needless transfer delays. PSAPs use automatic location information to dispatch aid to callers that cannot identify or communicate where they are located, and they use callback numbers to reach disconnected callers. Providers of legacy wireline service, Commercial Mobile Radio Service (CMRS or wireless), covered text service, interconnected Voice over Internet Protocol (VoIP) service, Multi-Line Telephone Systems (MLTSs), Mobile Satellite Service (MSS), and Telecommunications Relay Services (TRS), including Video Relay Service (VRS), IP Relay, and IP Captioned Telephone Service (IP CTS), each have their own 911 obligations under the Commission's rules.³ Our NG911 rules also require OSPs to transmit 911 traffic to 911 Authorities in a compatible IP format, and they establish a default allocation of cost responsibilities between these parties.⁴ And our 911 reliability rules establish best practice standards for

¹ 47 CFR § 9.28.

² See generally 47 CFR pt. 9; 47 CFR § 9.1. A PSAP is "[a]n answering point that has been designated to receive 911 calls and route them to emergency services personnel." 47 CFR § 9.3.

³ See 47 CFR §§ 9.4-9.18.

⁴ See 47 CFR §§ 9.27-9.34. A 911 Authority is a "State, territorial, regional, Tribal, or local governmental entity that operates or has administrative authority over all or any aspect of a communications network for the receipt of 911 traffic at NG911 Delivery Points and for the transmission of such traffic from that point to PSAPs." 47 CFR § 9.28.

covered 911 service providers,⁵ whose operations are essential to routing, transporting, and delivering 911 traffic between OSPs and PSAPs.⁶ Certain providers must additionally provide consumer disclosures,⁷ report 911 call data,⁸ or carry non-service initialized (NSI) calls.⁹

4. *911 scope criteria.* Over two decades ago, the Commission developed a four-factor analysis to determine whether and when to apply 911 requirements to emerging technologies, services, or providers not already covered by the Commission's existing 911 rules. The "911 scope" factors identified by the Commission were whether: (1) the service or device offers real-time, two-way voice service that is interconnected with the public switched telephone network (PSTN); (2) the customers using the service or device have a reasonable expectation of access to 911 and Enhanced 911 (E911)¹⁰ services; (3) the service competes with traditional wireless or legacy wireline local exchange service; and (4) it is technically and operationally feasible for the service or device to support E911 capabilities.¹¹ When the Commission adopted this scope analysis in 2003, it sought to balance consumer expectations and the need to strengthen access to emergency services with providers' need to compete in a competitive marketplace.¹² Since 2003, it has used this framework to extend 911 requirements to MSS providers, some telematics providers, mobile virtual network operators (MVNOs), interconnected VoIP providers, and covered text providers.¹³ However, the Commission has not exclusively relied on the 911 scope criteria when determining whether to adopt 911 requirements for particular services. For example, the Commission adopted 911 requirements for MLTS and TRS as the result of legislation¹⁴ and interim 911

⁵ 47 CFR § 9.19(a)(4). A CSP is "[a]ny entity that provides covered 911 services, which are 911, E911, or NG911 services for which a failure would impede the real-time routing, delivery, or transfer of 911 traffic." *Id.*

⁶ See 47 CFR §§ 9.19, 9.20.

⁷ See, e.g., 47 CFR § 9.11(b)(5)(i)-(iii) (requiring interconnected VoIP providers to advise subscribers of the circumstances under which E911 may not be available).

⁸ See, e.g., 47 CFR § 9.10(i)(3)(ii) (requiring wireless providers to provide live 911 call data, including the positioning source method for calls, to the Commission).

⁹ 47 CFR § 9.10(b) (requiring CMRS providers to transmit "all wireless 911 calls" regardless of validation). NSI devices are phones without a service contract with a CMRS provider that remain capable of operation, including prepaid phones that have run out of minutes and phones with expired contracts. *911 Call-Forwarding Requirements for Non-Service Initialized Phones*, PS Docket No. 08-51, Notice of Proposed Rulemaking, 30 FCC Rcd 3449, 3449-50, para. 1 & n.2 (2015).

¹⁰ E911 capabilities include providing appropriate routing, location, and callback information for a 911 call. See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Notice of Proposed Rulemaking, 9 FCC Rcd 6170, 6171, para. 6 (1994) (*E911 Wireless NPRM*).

¹¹ *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems et al.*, CC Docket No. 94-102 et al., Report and Order and Second Further Notice of Proposed Rulemaking, 18 FCC Rcd 25340, 25347, para. 18 (2003) (*E911 Scope Order*). The Commission's decisions to apply the 911 framework to new services and devices can be informed by other relevant factors as well. *Id.*

¹² *Id.* at 25342, para. 3.

¹³ *Id.* at 25341-42, para. 2; *IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, WC Docket Nos. 05-196 and 04-36, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245, 10256-57, para. 23 (2005) (*VoIP E911 Order*); *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment*, PS Docket Nos. 11-153 and 10-255, Report and Order, 29 FCC Rcd 9846, 9847, para. 1 (2014) (*T911 Order*).

¹⁴ *Implementing Kari's Law and Section 506 of RAY BAUM'S Act; Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communication Systems; Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules*, PS Docket Nos. 18-261 and 17-239 and GN Docket No. 117, Report and Order, 34 FCC Rcd 6607 (2019) (*MLTS/RAY BAUM'S Order*) (adopting MLTS and dispatchable location rules); *Telecommunications Relay Services for Individuals with Hearing and Speech Disabilities, and the Americans with*

requirements for Supplemental Coverage from Space (SCS) as a public interest condition of providing the service.¹⁵

5. *Changes in 911 access.* As market convergence blurs the historic distinctions among wireline, CMRS, VoIP, satellite, and other services, new communications offerings such as Wi-Fi calling, satellite direct-to-device (D2D), over-the-top (OTT) applications, Internet of Things (IoT) devices, and new models of MVNOs continue to emerge.¹⁶ Today, a growing variety of technologies, services, devices, and platforms are technically capable of supporting consumers' access to 911 but may not fit neatly within the Commission's existing 911 framework.¹⁷ At the same time, the nationwide migration to all-IP networks has intensified intermodal competition in the communications marketplace. This has enabled consumers to choose among an unprecedented and innovative range of providers and advanced services, including video conferencing and enterprise-grade connectivity—capabilities on which the public increasingly relies.¹⁸

6. In addition, device manufacturers, operating system developers, and application developers are playing an increasingly central role in how 911 calls are initiated, routed, and completed, as mobile devices and operating systems are frequently updated to support communications across an expanding array of platforms and networks.¹⁹ As a result, service providers may rely on them to a greater extent to meet their own 911 obligations.²⁰ Given these changes, 911 access increasingly is occurring across a converged ecosystem of connectivity rather than within discrete communications categories. In several recent reports, the Commission's Communications, Security, Reliability, and Interoperability Council (CSRIC) has recognized that emerging technologies are creating both opportunities and

Disabilities Act of 1990, CC Docket No. 90-571, Report and Order and Request for Comments, 6 FCC Rcd 4657, 4669, Appx. B (section 64.604(a)(3)) (1991) (requiring TRS services to handle emergency calls).

¹⁵ *Single Network Future: Supplemental Coverage from Space; Space Innovation*, GN Docket No. 23-65 and IB Docket No. 22-271, Report and Order and Further Notice of Proposed Rulemaking, 39 FCC Rcd 2622 (2024) (SCS Order).

¹⁶ See, e.g., AT&T, *AT&T WI-FI Calling: Talk from any place you have access to Wi-Fi*, <https://www.att.com/features/wifi-calling/> (last visited July 23, 2026); GSMA, *Major US Carriers Band Together in Joint Venture to Encourage D2D Competition* (May 21, 2026), <https://www.gsma.com/solutions-and-impact/technologies/networks/latest-ntn-news/major-us-carriers-band-together-in-joint-venture-to-encourage-d2d-competition/>; Intrado, *State of the 9-1-1 Industry 2026* at 124-28 (2026), <https://www.intrado.com/resources/state-of-the-9-1-1-industry-report-2026> (2026 *Intrado Industry Report*); Stuart Chowning, *The MVNO Opportunity Looks Very Different in 2026* (April 20, 2026), <https://www.mvnonation.com/insights/future-of-mvnos/the-mvno-opportunity-looks-very-different-in-2026/>.

¹⁷ For example, a 911 call initiated via a Wi-Fi calling application may rely on Wi-Fi, cellular, cable broadband, and cloud-based infrastructure before reaching a PSAP. Communications, Security, Reliability, and Interoperability Council VIII, Working Group 4, Report on 911 Service Over Wi-Fi at 7, 20-21, 81 (2023), <https://www.fcc.gov/sites/default/files/CSRIC8-Report-911overWi-Fi032123.pdf> (CSRIC 911 Over Wi-Fi Report).

¹⁸ *Advancing IP Interconnection; Accelerating Network Modernization; Call Authentication Trust Anchor*, WC Docket Nos. 25-304, 25-208, and 17-97, Notice of Proposed Rulemaking, 40 FCC Rcd 8566, 8572, para. 12 (2025).

¹⁹ See Federal Trade Commission, *Mobile Security Updates: Understanding the Issues* at 31 (2018), https://www.ftc.gov/system/files/documents/reports/mobile-security-updates-understanding-issues/mobile_security_updates_understanding_the_issues_publication_final.pdf (noting that “[s]ome operating system developers and device manufacturers reported that they prefer to deploy their own updates to maximize control over the testing and deployment schedule”).

²⁰ See *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Sixth Report and Order and Order on Reconsideration, 35 FCC Rcd 7752, 7771-72, para. 43 (2020) (*Z-Axis Sixth Order*) (“Verizon and AT&T ask the Commission to take regulatory action directed at device manufacturers to require their cooperation with wireless providers to meet the z-axis deadlines.”).

challenges for emergency communications and has recommended that the Commission evaluate how they should be addressed.²¹

7. Wi-Fi and satellite in particular are two rapidly evolving technologies that enable access to 911 when cellular coverage is weak or unavailable, typically through in-building connectivity for Wi-Fi and outdoor connectivity for satellite. Recognizing their importance, the Commission has undertaken several initiatives to advance their use for emergency communications.²² The 2021 *Report to Congress on Wi-Fi* and the 2023 *CSRIC 911 Over Wi-Fi Report* examined 911 services over Wi-Fi in depth and identified several challenges, including mobile device authentication and roaming, call routing, and caller location determination, among others.²³ Since then, advancements in Wi-Fi standards and technologies have opened promising opportunities to address some of these challenges and advance 911 over Wi-Fi.²⁴ On the satellite side, SCS and D2D capabilities have the potential to bridge connectivity gaps in rural, off-grid, offshore, and disaster-affected areas.²⁵ All three nationwide CMRS providers have partnered with satellite operators to offer satellite messaging services under the Commission's SCS framework.²⁶

²¹ For example, CSRIC VIII recommended that the Commission examine how Wi-Fi technologies can expand access to 911, clarify which entities have 911 service and location accuracy obligations, and consider how advances in location and routing functions could support more effective emergency communications. *CSRIC 911 Over Wi-Fi Report* at 8-10, 49-52, 60-63. Building on that work, CSRIC IX recommended that the Commission continue evaluating the role of alternative network technologies in supporting emergency calling. CSRIC IX, Working Group 2, Report on Recommendations for Connecting Stalled 911 Calls Through Alternative Network Options at 3-5, 20-22 (2025), <https://www.fcc.gov/CSRICReports> (*First CSRIC Alternative Networks Report*). CSRIC IX also examined how alternative network technologies may affect PSAPs and NG911 systems. CSRIC IX, Working Group 2, Report on Recommendations for Preventing Adverse Impacts on PSAPs and NG911 from 911 Calls Made Through Alternative Networks at 20-23, 29-31 (2026), <https://www.fcc.gov/CSRICReports> (*Second CSRIC Alternative Networks Report*).

²² See, e.g., FCC, Report to Congress: Study on Emergency 911 Access to Wi-Fi Access Points and Spectrum for Unlicensed Devices When Mobile Service Is Unavailable (2021), <https://docs.fcc.gov/public/attachments/DOC-371031A1.pdf> (*Report to Congress on Wi-Fi*); *CSRIC 911 Over Wi-Fi Report*; SCS Order, 39 FCC Rcd 2622.

²³ See *Report to Congress on Wi-Fi* at 9-11, paras. 17-24; *CSRIC 911 Over Wi-Fi Report* at 16, 46; *First CSRIC Alternative Networks Report* at 10.

²⁴ For example, Wi-Fi 7, also known as IEEE 802.11be, released in 2024, offers a significant amount of new spectrum, additional wider channels, reduced interference from other devices, and enhanced security through the latest Wi-Fi Protected Access 3 standard. See Cisco, *What is Wi-Fi 7?*, <https://www.cisco.com/site/us/en/learn/topics/networking/what-is-wi-fi-7.html> (last visited July 23, 2026); Dan Harkins, *Wi-Fi Certified Enhanced Open: Transparent Wi-Fi protections without complexity*, <https://www.wi-fi.org/beacon/dan-harkins/wi-fi-certified-enhanced-open-transparent-wi-fi-protections-without-complexity> (last visited July 23, 2026). Additionally, OpenRoaming Release 5, launched in 2025, introduces further enhancements to the OpenRoaming framework, which aims to create a global ecosystem in which devices automatically and securely connect to participating Wi-Fi networks. See Wireless Broadband Alliance, *OpenRoaming: A Global Solution for Ensuring User Privacy and Security in Wi-Fi Networks*, <https://wballiance.com/openroaming-a-global-solution-for-ensuring-user-privacy-and-security-in-wi-fi-networks/> (last visited July 23, 2026). Furthermore, IEEE 802.11az, known as Next Generation Positioning, improves location accuracy to below one meter, while IEEE 802.11bk, which extends 802.11az by enabling operation with 320 MHz channels in the 6 GHz band, further improves location accuracy to below 0.1 meter. See IEEE Standards Association, *Newly Released IEEE 802.11az Standard Improving Wi-Fi Location Accuracy is Set to Unleash a New Wave of Innovation* (May 31, 2023), <https://standards.ieee.org/beyond-standards/newly-released-ieee-802-11az-standard-improving-wi-fi-location-accuracy-is-set-to-unleash-a-new-wave-of-innovation/>; Katarzyna Kosek-Szott et al., *Indoor Positioning with Wi-Fi Location: A Survey of IEEE 802.11mc/az/bk Fine Timing Measurement Research* (Sept. 4, 2025), <https://arxiv.org/pdf/2509.03901v1>.

²⁵ See 2026 Intrado Industry Report at 67.

²⁶ T-Mobile, *T-Satellite connects you where towers can't*, <https://www.t-mobile.com/coverage/satellite-phone-service> (last visited July 23, 2026); Satnews, *AT&T, AST SpaceMobile Advance Satellite-to-Cell Expansion Following BlueBird 6 Deployment* (Jan. 1, 2026), <https://satnews.com/2026/01/01/att-ast-spacemobile-advance-satellite-to-cell-expansion-following-bluebird-6-deployment/>; Associated Press, *Verizon Teams With AST*

Consumer mobile devices also increasingly support text messaging on mobile satellite spectrum, without a terrestrial network connection, when cellular and Wi-Fi networks are unavailable.

8. OTT calling and messaging applications (apps), as well as IoT devices, such as wearables, virtual assistants, and smart speakers, can support real-time voice, text, or video communications similar to traditional cellular services, but typically they either do not support 911 calls or texts or they provide only limited 911 functionality.²⁷ Given these apps' similarities with traditional telephony, some consumers may incorrectly assume they can reach 911 via those apps, even if the provider has warned them otherwise. IoT devices come in many varieties, and their treatment of 911 access, where applicable, varies notably. For example, some wearables can call and text 911 and share the user's location.²⁸ Additionally, home alarms can automatically send data about an event to a PSAP,²⁹ whereas in-home smart speakers may not be 911 capable. While these devices serve a variety of purposes, they illustrate that devices with similar communications capabilities may provide markedly different access to emergency services, raising questions about the consumer expectations such devices create. There are also IoT devices that can automatically detect emergencies and either contact an intermediary, which can then notify 911, or contact 911 directly on behalf of users who are incapacitated or otherwise unable to call for help.³⁰

9. *Changes in emergency data delivery and response.* The ways in which 911 Authorities receive and use emergency information are changing as well. 911 Authorities increasingly receive critical emergency information from a wide range of applications, platforms, and devices that operate outside the traditional 911 call path (e.g., RapidSOS) and may fall beyond the scope of the current 911 framework. Many connected vehicle systems, safety platforms, medical and security devices, wearables, and IoT devices can initiate emergency communications without the consumer ever pressing "send."³¹ While new technologies and capabilities provide substantial benefits during emergencies for the individuals involved, PSAPs, and first responders, they also present challenges.³² For example, automatically generated alarms

SpaceMobile on Space-Based Cellular Service (Oct. 8, 2025), <https://www.usnews.com/news/best-states/new-york/articles/2025-10-08/verizon-teams-up-with-ast-spacemobile-to-provide-cellular-service-from-space>. See also *SCS Order*, 39 FCC Rcd at 2623, para. 1 (adopting the SCS framework that enables collaborations between satellite operators and terrestrial services providers to provide ubiquitous connectivity directly to consumer handsets using spectrum previously licensed only to terrestrial services providers). The interim 911 rules for SCS providers do not address satellite operators offering D2D service independent of CMRS providers. See 47 CFR § 9.10(t)(1). This and other questions relating to 911 connectivity via satellite service remain pending before the Commission. See, e.g., *SCS Order*, 39 FCC Rcd at 2725-31, paras. 239-256.

²⁷ The Commission previously has sought comment on issues related to public safety-related smartphone applications that interact with, supplement, or potentially bypass the 911 system. See *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, Public Notice, 31 FCC Rcd 13246 (PSHSB 2016).

²⁸ *2026 Intrado Industry Report* at 74-75, 126-27.

²⁹ Intrado, *State of the 9-1-1 Industry: 2025 Trends and Technologies Shaping the Future* at 76 (2025), <https://www.intrado.com/resources/state-of-the-9-1-1-industry-report-2025> (*2025 Intrado Industry Report*)

³⁰ See *2025 Intrado Industry Report* at 72 ("[S]martwatches, and other [IoT] devices now [are] able to automatically detect emergencies and contact 9-1-1 on behalf of users/wearers who may be incapacitated or unable to call for help themselves.").

³¹ *Id.* at 9, 44, 72.

³² PSAPs face challenges with international emergency calls during major global events such as the 2026 FIFA World Cup and the 2028 Olympics in Los Angeles. During these events, PSAPs can expect a significant increase in calls from international visitors using mobile devices purchased and provisioned outside the U.S. and may face increased security risks. News Release, FCC, FCC Supporting America's Success as FIFA World Cup Host (June 11, 2026), <https://docs.fcc.gov/public/attachments/DOC-422317A1.pdf>. These calls often behave differently from domestic wireless calls, which can impair 911 service and emergency response. See National Emergency Number Association (NENA), *International Wireless Calls to 9-1-1: Challenges, Limitations, and Practical Steps for 9-1-1*

transmitted directly to PSAPs, such as those originating from vehicles or wearables, can save lives in true emergencies when every second counts, but false alarms can consume significant time and resources.³³

10. Alongside the broader IP transition, 911 Authorities also are replacing their legacy 911 networks with IP-based NG911 networks.³⁴ NG911 is capable of improving speed, resiliency, interoperability, and accessibility and supports new features, such as the ability to transmit texts, photos, videos, and other data to PSAPs.³⁵ NG911 also enables new data types that challenge the legacy service-based 911 regulatory model. The Commission has proactively encouraged these developments while adopting safeguards to protect reliable access to 911 during the IP and NG911 transitions.³⁶ 911 Authorities are also increasingly replacing on-premises call-taking and dispatch equipment with software- and cloud-based solutions, and they are incorporating location and emergency-response data services, AI tools, and other technologies that support the receipt, processing, analysis, and exchange of emergency information.³⁷

III. DISCUSSION

A. Core Objectives of the 911 Framework

11. At this moment of rapid transformation, we believe it is important to identify the enduring core objectives that will guide the Commission as it adapts the 911 framework for the next

PSAP/ECCs (May 15, 2026), https://cdn.ymaws.com/www.nena.org/resource/resmgr/images/nena_international_calling_f.pdf.

³³ See Letter from Douglas A. Klein, Senior Counsel, Association of Public-Safety Communications Officials International, Inc. (APCO), to Marlene H. Dortch, Secretary, FCC, WP Docket No. 07-100 et al., at 2 and Attach. C (filed July 15, 2026); *2025 Intrado Industry Report* at 74; Keenan Stites, *Automated 911 System on Modern Cell Phones a “Double-Edged Sword”* (June 17, 2026), https://www.terrytribune.com/news/automated-911-system-on-modern-cell-phones-a-double-edged-sword/article_eb28022c-86df-4d3c-8230-baa7875a358b.html; WRAL News, *First responders deal with false alarms due to smartphone crash detection feature* (Oct. 6, 2025), <https://www.wral.com/news/local/false-alarms-smartphone-crash-detection-southern-pines-2025/>.

³⁴ *Facilitating Implementation of Next Generation 911 Services; Location-Based Routing for Wireless 911 Calls*, PS Docket Nos. 21-479 and 18-64, 39 FCC Rcd 8137, 8138, para. 1 (2024) (*NG911 Transition Order*). NG911 systems enable emergency communications centers to receive, process, and analyze all types of 911 requests for emergency assistance; ensure interoperability; are secure; and meet certain other requirements. 47 CFR § 9.28. See also National Telecommunications and Information Administration, *Next Generation 9-1-1 (NG911) Cost Study* (2026), <https://www.ntia.gov/report/2026/next-generation-9-1-1-ng911-cost-study> (estimating the remaining costs required to complete the nationwide transition from legacy 911 systems to secure, interoperable, IP and standards-based NG911 systems).

³⁵ *NG911 Transition Order*, 39 FCC Rcd at 8144, para. 14; *id.* at 8207-08, para. 156 (noting that multimedia support improves accessibility for persons who are deaf, hard of hearing, deafblind, or have a speech disability); see also, e.g., StateScoop, *North Carolina officials say next-generation 911 network withstood Hurricane Helene* (Oct. 21, 2024), <https://statescoop.com/north-carolina-next-generation-911-hurricane-helene/> (“Had the old technology and analog network still been in place, the infrastructure would have been destroyed and we would not have had the capability to route calls to other PSAPs and connect people to critical emergency services Thanks to the resiliency and redundancy of this network, we had no reports of 911 calls not being delivered.”).

³⁶ See, e.g., *Reducing Barriers to Network Improvements and Service Changes; Accelerating Network Modernization*, WC Docket Nos. 25-209 and 25-208, Report and Order, FCC 26-19, 2026 WL 1016892 (Mar. 27, 2026) (*IP Transition Order*) (streamlining the processes for retiring legacy copper infrastructure and discontinuing legacy voice services while adopting new notification and coordination requirements to mitigate impacts on 911 networks); *NG911 Transition Order*, 39 FCC Rcd 8137 (creating a guaranteed transition pathway for 911 Authorities that are prepared to receive IP-based NG911 service); *Facilitating Implementation of Next Generation 911 Services (NG911); Improving 911 Reliability*, PS Docket Nos. 21-479 and 13-75, Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 26-39, 2026 WL 2018708 (June 26, 2026) (*NG911 Reliability Order*) (updating the 911 reliability rules so that NG911 call flows are protected by best practices tailored to IP networks).

³⁷ *2025 Intrado Industry Report* at 44, 58-69.

generation of communications technologies. We identify and seek comment on the following overarching core objectives for the Commission's 911 policies:

- Ensuring the public has access to reliable, resilient, accessible, secure, and consistent 911 communications across platforms in a way that meets the evolving expectations of consumers.³⁸
- Supporting the ability of public safety authorities to receive emergency communications and related information needed to deliver timely and effective emergency services.³⁹
- Promoting the development of innovative and improved emergency communications technologies regardless of the platform used, while accounting for feasibility and implementation burdens.⁴⁰

12. These core objectives arise from the Commission's long track record in acting to promote 911, emergency communications, and public safety. We seek comment on how these objectives should be considered in our evaluation of the potential for new and emerging technologies and platforms to support 911 and enhance the public's ability to access emergency assistance. Should we regard these objectives as constant and enduring, or should any of them be modified, updated, or weighed differently? Should we consider new core objectives in addition to or instead of any of these?

B. 911 Scope Criteria

13. We next consider whether and how the existing 911 scope criteria should evolve to reflect changes in technology, network design, and the communications marketplace more broadly. Adopted in 2003, the Commission's scope analysis was designed to "provide a transparent methodology for determining which classes of services and devices may be expected to comply with [the] E911 rules."⁴¹ The analysis specifically focused on whether a service or device (1) offers interconnected, real-time, two-way voice service; (2) gives users a reasonable expectation of access to 911 and E911; (3) competes with traditional CMRS or legacy wireline service; and (4) can feasibly support E911.⁴² We seek comment on whether the framework as a whole should be retained or modernized. We also invite comment on the continued relevance and effectiveness of each of the four criteria individually.

14. With respect to the framework as a whole, historically, the Commission has applied its 911 scope analysis on a service-by-service basis. Should we continue to rely on this approach, or should

³⁸ See, e.g., *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 18676, 18678, paras. 1-2 (1996) (*E911 Wireless Order*); *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment*, PS Docket Nos. 11-153 and 10-255, Report and Order, 28 FCC Rcd 7556, 7561-63, paras. 13-17 (2013) (*Bounce-Back Order*); *T911 Order*, 29 FCC Rcd at 9847, 9852-57, paras. 1, 12-22; *MLTS/RAY BAUM'S Order*, 34 FCC Rcd at 6608, paras. 1-2.

³⁹ See, e.g., *Implementation of 911 Act; The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, WT Docket No. 00-110 and CC Docket No. 92-105, Fourth Report and Order and Third Notice of Proposed Rulemaking, 15 FCC Rcd 17079, 17081, paras. 1-3 (2000) (*911 Numbering Order*); *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Fourth Report and Order, 30 FCC Rcd 1259, 1260, paras. 1-4 (2015) (*Z-Axis Fourth Order*); *NG911 Transition Order*, 39 FCC Rcd at 8138-41, paras. 1-7; *NG911 Reliability Order* at **46-49, paras. 137-147.

⁴⁰ See, e.g., *E911 Wireless Order*, 11 FCC Rcd at 18678, paras. 1-2; *VoIP E911 Order*, 20 FCC Rcd at 10246-48, paras. 1-5; *MLTS/RAY BAUM'S Order*, 34 FCC Rcd at 6608, paras. 1-2; *NG911 Reliability Order* at *12, para. 34.

⁴¹ *Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems et al.*, CC Docket No. 94-102 et al., Further Notice of Proposed Rulemaking, 17 FCC Rcd 25576, 25581, para. 12 (2002) (*E911 Scope NPRM*) (also noting that the criteria would "provide commenters a basis on which to make their arguments for or against inclusion of providers of a particular service or device").

⁴² See, e.g., *E911 Scope Order*, 18 FCC Rcd at 25347, para. 18.

we explore alternatives? We seek comment on whether a service-by-service approach is still the best mechanism for framing this analysis, or whether we should consider technologies, platforms, or communications capabilities more holistically. In addition, our existing scope criteria focus on E911 but were adopted prior to the advent of NG911. To what degree should our scope analysis continue to focus on support for E911 capabilities (provision of automatic location and call-back number) and how should we modify or update it to account for NG911 and other emerging communications capabilities? Are there approaches that would be better suited to the recent evolution of technology? At what point in the development or deployment of an emerging communications service, technology, platform, or device should we undertake our analysis? What is the importance of whether there is a significant current or potential population of 911 users when considering a service or technology?

1. Real-Time, Two-Way Voice Service Interconnected with the PSTN

15. Turning to the individual elements of the Commission's existing scope analysis, the first element examines whether a service offers real-time, two-way voice service that is interconnected with the PSTN on either a stand-alone basis or packaged with other telecommunications services.⁴³ We consider and seek comment on various facets of this criterion.

16. *Real-time, two-way voice service.* The Commission first formulated this criterion to capture both consumer and public safety expectations: real-time, two-way voice services are types of services for which consumers expect 911 access, that PSAPs are designed to serve, and for which there is already a significant population of 911 users.⁴⁴ This descriptor therefore identifies services that act as substitutes for traditional telephony and can provide E911 services.⁴⁵ Does real-time, two-way voice communication continue to identify the services and technologies that should be subject to the Commission's 911 framework? Is this criterion too broad or too narrow? What level of delay or latency would indicate that service is not provided in real-time? The 911 framework already addresses text-to-911, a non-voice service.⁴⁶ NG911 will support a greater array of advanced 911 capabilities for consumers, such as video calls and the transmission of data, photos, and other multimedia to PSAPs.⁴⁷ Given these developments, should we expand this criterion to services that fall outside the definition of "voice" or voice-equivalent⁴⁸ services, or to one-way communications? If so, which services? Should we extend our framework to technologies that rely primarily on transmitting data instead of voice or voice-equivalent services? We note that the transmission of data alongside 911 calls to facilitate dispatch has always been an important aspect of 911 service.⁴⁹ What types of device or provider data are most critical

⁴³ *Id.* In this context, a "two-way voice service" is one that enables multiple speakers to converse with one another directly, as opposed to, for example, a stored voice (voice messaging) or one-way paging service. See *E911 Wireless Order*, 11 FCC Rcd at 18714-17, paras. 77, 81. Although outbound-only VoIP service is sometimes referred to as "one-way VoIP", that term describes the direction in which calls are initiated relative to the PSTN, not whether participants in a call can communicate with one another in both directions once the call is connected. See, e.g., *MLTS/RAY BAUM'S Order*, 34 FCC Rcd at 6625-26, 6679-80, paras. 52, 192.

⁴⁴ *E911 Wireless NPRM*, 9 FCC Rcd at 6177, para. 38.

⁴⁵ See, e.g., *id.* at 6176-77, paras. 37-38; *E911 Wireless Order*, 11 FCC Rcd at 18716-17, para. 81.

⁴⁶ 47 CFR § 9.10(q); *T911 Order*, 29 FCC Rcd at 9847, para. 1 (adopting text-to-911 rules, without applying the scope criteria, because of "the unique value of text-to-911 for the millions of Americans with hearing or speech disabilities, and because of the crucial role it can play in protecting life and property when making a voice call would be dangerous, impractical, or impossible due to transmission problems").

⁴⁷ *NG911 Transition Order*, 39 FCC Rcd at 8207-08, para. 156.

⁴⁸ *E911 Scope NPRM*, 17 FCC Rcd at 25582, para. 14 (TTY meets this criterion as a "voice equivalent" service.).

⁴⁹ See, e.g., 47 CFR §§ 9.8, 9.10(d)-(i), 9.11(b), 9.14(b)-(e), 9.16, 9.18 (requiring various provider classes to transmit automated dispatchable location or other location information and/or callback numbers with 911 calls).

for 911 Authorities to receive to facilitate emergency response? Is it relevant whether a consumer actively initiates the communication with emergency services?

17. *PSTN interconnection.* When the Commission adopted this criterion, the PSTN served as the principal means by which consumers accessed emergency services. As more communications need not rely on the PSTN with the rise of IP,⁵⁰ we question whether “PSTN interconnection” continues to make sense as a defining factor in the Commission’s analysis of which services and technologies fall within the 911 framework. We seek comment on this view. For example, enterprise collaboration platforms, private IP communications systems, OTT apps, and some IoT devices and satellite services do not rely on the PSTN, but consumers may be able to reach emergency services from these technologies or expect to be able to do so.⁵¹ Which services or technologies that do not rely on the PSTN are experiencing or will experience the greatest growth in consumer use? What alternatives or replacements to this criterion should we consider? Could we consider the capability to reach all or substantially all U.S. telephone numbers as an indication of sufficient interconnection to trigger 911 obligations? What if a service limits how many North American Numbering Plan (NANP) telephone numbers a user may reach? How should OTT apps and services that allow only in-app communications be treated? As telephone numbers become less relevant to many IP-based applications and services, should public and private IP addresses be considered as alternative indicators of interconnection, and if so, how? While 911 originated as a PSTN telephone number, users increasingly can access “911” emergency services without physically dialing the digits 9-1-1.⁵² What implications does this evolution have for the relevance of the PSTN to our scope analysis?

18. *Other considerations.* Any technology or service that can initiate a connection with 911 impacts 911 Authorities, because they must determine whether and how to manage and respond to those contacts. Such technologies and services may also create expectations for consumers that they can connect with 911 during times of emergency. Should we additionally or instead consider the ability to support access to 911, interoperability with other communications networks or platforms, or the role a service plays in supporting emergency communications? What characteristics distinguish services that merely facilitate communications to 911 from those that should be expected to support full access to 911 capabilities?

2. Consumer Expectations

19. Next, we consider the criterion of whether consumers using a service or device have a reasonable expectation of access to 911, E911, or NG911 capabilities. The Commission has recognized that consumers may not understand the technical distinctions among different technologies and that assumptions about access to 911 could have life-threatening consequences.⁵³ For example, calling 911 from an application on a wireless device may not automatically access the device’s location capabilities, or it may require the user to enable location services before the call. The Commission has consistently

⁵⁰ See, e.g., *IP Transition Order*, at *16 (“[T]here are many other types of telecommunications offerings, including apps running solely on data networks that are nearly indistinguishable to the consumer from the core communications functionality of the [PSTN] . . . that combine the benefits of voice, video, and text communications into one data-based service,’ obviating the need or desire for stand-alone voice service.”) (citation omitted).

⁵¹ The free versions of OTT messaging apps generally limit users to in-app messaging and calling, but some OTT apps offer paid versions that include interconnected communications.

⁵² See 47 U.S. Code § 251(e)(3) (directing the Commission to “designate 9–1–1 as the universal emergency telephone number within the United States for reporting an emergency to appropriate authorities and requesting assistance”).

⁵³ See, e.g., *MLTS/RAY BAUM’S Order*, 34 FCC Rcd at 6626, para. 53 (“[I]t is simply unreasonable to expect 9-1-1 callers to know or remember when they are required to do something differently during a 9-1-1 call based on their particular device or location.”) (quoting comment).

treated consumer expectations as an important consideration and has recognized that those expectations may change as new technologies emerge.⁵⁴

20. *Current state of consumer expectations.* We seek comment on consumers' current and evolving expectations for 911 functionality across services and technologies. Most 911 calls originate on mobile wireless devices and traverse CMRS provider networks.⁵⁵ What are consumers' current expectations for reaching emergency services from CMRS services? What are consumers' expectations for other mobile services and technologies such as Wi-Fi calling, D2D, OTT calling and messaging, and wearables? What are consumers' expectations for 911 functionality through other types of frequently used services and technologies, such as fixed wireless, videoconferencing, and IoT virtual assistant technology? Does the public understand the term "911" to encompass non-telephony forms of emergency communications, and if so, which ones? We also seek comment on how consumers' expectations may change in the future. Which technologies and applications are likely to have the greatest impact on consumer expectations over the next five to ten years? As new technologies increasingly serve as alternatives or successors to traditional telephony, do consumers routinely expect access to 911 from those technologies, and if so, which? Are there characteristics of a service or technology that make such an expectation more likely? Does that expectation arise principally from the offering's functionality, marketing, actual consumer use, the broader communications environment, or other factors?⁵⁶ As new and innovative communications technologies become available, should we anticipate how consumer expectations are likely to develop, or should we rely on well-established expectations for similar technologies? To what extent should we also consider the reasonable expectations of 911 Authorities, 911 telecommunicators, and emergency responders?

21. *Determining reasonable expectations.* We also consider which expectations of access to 911 are "reasonable." Consumers may not expect every new technology and service that supports 911 access to provide the full range of enhanced 911 capabilities. Should the scope analysis account for such limited expectations, at least for technologies that are not substitutes for traditional telephony? Conversely, how should the analysis address consumer expectations for 911 capabilities that exceed what an offering can actually provide? Are consumer expectations shaped by a provider's marketing or by its decision to discourage or intentionally limit access to 911, and if so, does that matter? Similarly, the Commission itself may affect consumer expectations by requiring service providers to make new 911 capabilities available to consumers or to make disclosures about the availability of 911 services where confusion might exist.⁵⁷ Should the analysis additionally consider expectations for 911 access through comparable offerings? What if a communications offering does not connect to emergency services, as is the case with certain OTT apps, but is routinely bundled with or delivered via devices or services that

⁵⁴ See, e.g., *T911 Order*, 29 FCC Rcd at 9847, 9863, paras. 1, 37.

⁵⁵ As of 2024, approximately 71.3 percent of 911 calls reported to the Commission originate from wireless phones over CMRS provider networks, with other reported service types (wireline, VoIP, and other) representing less than 10 percent of 911 calls each. FCC, Seventeenth Annual Report to Congress on State Collection and Distribution of 911 and Enhanced 911 Fees and Charges at 13-16, para. 14 & tbl. 3 (2026), [fcc.gov/sites/default/files/17thAnnual911FeeReport-021326.pdf](https://www.fcc.gov/sites/default/files/17thAnnual911FeeReport-021326.pdf) (*Seventeenth 911 Fee Report*).

⁵⁶ *Compare E911 Scope Order*, 18 FCC Rcd at 25372-73, paras. 77-78 (urging telematics providers to warn their customers about the limited emergency capabilities of their service offerings), with *VoIP E911 Order*, 20 FCC Rcd at 10272-73, para. 48 (noting that the warnings VoIP providers placed on their web sites and in their terms of service may not have changed the service expectations of many consumers).

⁵⁷ See, e.g., *Z-Axis Sixth Order*, 35 FCC Rcd 7752 (establishing deadlines for CMRS providers to implement vertical location capabilities for the first time); see also *MLTS/RAY BAUM'S Order*, 34 FCC Rcd at 6680, para. 192 (noting that it was not surprising consumers did not at that time expect outbound-only VoIP to support 911 dialing and location, since providers of one-way VoIP had not previously been subject to these 911 obligations); *E911 Scope Order*, 18 FCC Rcd at 25360, para. 48 (discussing a labeling requirement adopted due to concern "that consumers may have difficulty distinguishing between terrestrial CMRS handsets subject to basic and [E]911 requirements and satellite handsets that were not subject to any 911 requirements").

consumers strongly associate with 911 access? How should we evaluate consumer expectations for offerings that allow users to contact emergency services but do not require them to dial 911 to do so? Moreover, while consumer expectations are certainly critical, the Commission has not always treated consumer expectations as dispositive.⁵⁸

3. Competition with Traditional Voice Service

22. The Commission's third scope criterion is whether a service competes with traditional CMRS or wireline local exchange service. As communications markets change, it is less clear whether traditional telephone services remain the appropriate benchmark for evaluating new and existing communications offerings.⁵⁹ Does competition provide an objective indication that consumers regard a communications offering as a substitute for traditional telephone service? How should the Commission evaluate communications offerings that compete with only certain aspects of traditional telephone service, rather than serving as comprehensive substitutes? To what extent should the Commission also look for similarities in functionality, capability, or other features? Would a different formulation of this criterion better reflect today's communications marketplace? We see value in applying 911 requirements equally to similarly situated technologies and services to support competition in a converged environment. Are there circumstances in which competition with traditional voice services should continue to weigh strongly in favor of applying 911 requirements, even if other criteria are less clearly satisfied? How, if at all, should this criterion be applied to offerings that are data-driven, serve specialized users, or otherwise clearly fall outside of traditional telephone service markets?

4. Feasibility

23. The final factor in the Commission's existing four-criteria framework is whether it is technically and operationally feasible for the service or device to support E911.⁶⁰ As part of this criterion, the Commission has considered technical capabilities as well as costs, the availability of alternatives, and anticipated timing of future technologies and standards.⁶¹ We continue to believe it is important to establish objective and administrable limiting principles for determining which communications offerings should become subject to 911 requirements. This should include weighing the public safety benefits of potential regulations against their implementation costs and feasibility. We seek comment on these and other potential considerations.

24. We also seek comment on evaluating feasibility as services and technologies evolve. To what extent should we examine the capabilities of the communications offering itself, the broader

⁵⁸ See, e.g., *MLTS/RAY BAUM'S Order*, 34 FCC Rcd at 6678, para. 190 (declining to "make consumer expectations the touchstone for determining what types of services should be subject to 911 obligations" and stating that "[t]he statutory focus . . . is on enabling the user to reach emergency services to request assistance, 'regardless of the technological platform,' not on whether the service bears similarity to a traditional two-way phone call or whether consumers perceive it as such") (citing Section 506 of the Repack Airwaves Yielding Better Access for Users of Modern Services Act of 2018 (RAY BAUM'S Act), Pub. L. No. 115-141, 132 Stat. 348, 1095 (codified at 47 U.S.C. § 615 note)).

⁵⁹ See *E911 Scope Order*, 18 FCC Rcd at 25373, para. 79 (observing that standard telematics services did not compete with CMRS providers because they did not provide voice communications via the PSTN, a consideration already reflected in the first scope criterion).

⁶⁰ *E911 Scope Order*, 18 FCC Rcd at 25347, para. 18.

⁶¹ See, e.g., *E911 Scope Order*, 18 FCC Rcd at 25348-51, paras. 22-28 (adopting MSS call center requirement in lieu of E911 requirements based on technical limitations, costs and number of users, and as an interim approach pending future E911 implementation); *id.* at 25354-59, paras. 35-39, 41, 44 (noting uneven location accuracy capabilities among providers, cost and liability concerns, and the status of technical standards development); *id.* at 25362-63, para. 52 (discussing the availability of multiple effective technical solutions for MLTS providers, their need to coordinate with local exchange providers and PSAPs, and states' differing network preferences); *id.* at 25373, para. 80 (finding that the lead times needed to develop E911 capabilities would unduly constrain the life cycle for developing, testing, and producing automotive telematics).

communications environment in which it operates, or the extent to which it depends on devices, operating systems, network providers, cloud services, or other third parties? How should we evaluate the extent to which feasibility is directly or indirectly within a provider's control? To what extent should the Commission evaluate the capabilities of a communications offering itself, rather than how a provider has chosen to implement it? For example, if a device can be programmed to call ten-digit NANP numbers, should it be required to enable 911 calling?

25. Capabilities that are not reasonably achievable today may become practical as technologies mature, standards develop, implementation expands, or supporting infrastructure evolves. To what extent should we evaluate technologies based on their current capabilities, anticipated future capabilities, or what could be possible given the appropriate deployment of resources? How, for example, should we assess feasibility in light of the ongoing NG911 transition, which will permit 911 Authorities to accept new types of communications?⁶² Should distinct considerations apply to consumer-facing communications services, end-user devices and platforms, software and databases supporting PSAPs and emergency response, and other elements of the emergency communications ecosystem? What other practical, operational, or economic considerations, if any, are relevant to the Commission's evaluation of technical feasibility? How should the Commission distinguish between true limitations and those that merely affect the nature or timing of the obligations? To what extent are alternative implementation approaches, phased deployment, or the ability to coordinate with other providers relevant when evaluating technical feasibility?

C. Harmonizing 911 Service Requirements

26. As noted above, the Commission has historically applied its 911 scope analysis on a service-by-service basis and has tailored most 911 requirements to the technical limitations and operational role of each covered technology and type of provider.⁶³ This approach has allowed the Commission to account for meaningful differences among communications technologies, but it can also result in uneven requirements for different types of providers. Inconsistencies may become more problematic as advances in communications technologies increasingly blur the distinctions between traditional service categories. In addition, consumers may perceive new offerings as providing similar capabilities to those provided by traditional services. We therefore examine, in light of the changing communications ecosystem and in consideration of consumer expectations, whether the Commission's existing service-specific approach remains appropriate or whether there are better ways to structure our rules.

27. We seek comment on the value of harmonizing 911 requirements across service categories as well as benefits and drawbacks to this approach. We consider offerings that combine multiple communications technologies or operate across multiple communications networks. With the rise of converged and IP-based services, especially those services originating on mobile phones like voice, Wi-Fi calling, texting, and D2D, we anticipate that differences in 911 capabilities across technologies will narrow.⁶⁴ Backend IP transport networks, regardless of modality, may eliminate

⁶² *NG911 Transition Order*, 39 FCC Rcd at 8207-08, para. 156.

⁶³ See, e.g., *MLTS/RAY BAUM'S Order*, 34 FCC Rcd at 6655-91, paras. 137-220 (varying dispatchable location requirements by service type based primarily on technical feasibility); *SCS Order*, 39 FCC Rcd at 2695-98, paras. 174-178 (adopting only limited, interim 911 requirements for SCS given its novelty and the uncertain feasibility of its compliance with all existing 911 requirements). See also *Z-Axis Fourth Order*, 30 FCC Rcd at 1260-62, paras. 4-6 (adopting phased location accuracy requirements based on the technical capabilities of wireless services and their expected improvement over time).

⁶⁴ See, e.g., *2026 Intrado Industry Report* at 67-75 (describing emerging D2D, SCS, MSS, and other satellite service deployments that will deliver 911 calls and texts from cell phones or wearable devices using both satellite and terrestrial networks, typically through partnerships with CMRS or MVNO providers); *CSRIC 911 Over Wi-Fi Report* at 7, 20-21, 81 (discussing possible call flows for Wi-Fi calling applications that combine Wi-Fi, cellular, cable broadband, and/or cloud-based networks).

distinctions that would traditionally apply to different service types. To what extent would uniform rules across service providers and technologies improve the 911 experience for consumers, simplify 911 regulations, increase competition in the marketplace, spur investment and innovation, or provide other public interest or safety benefits? Are there categories that should not be harmonized and remain technology-specific? We also seek comment on the potential economic impacts of greater 911 regulatory harmonization.

28. We seek comment on possible harmonization approaches. We could, as one example, identify a baseline set of functional 911 capabilities for all providers, regardless of underlying technology or regulatory classification. We believe such capabilities would include location, callback number, and routing to the appropriate 911 Authority. We seek specific comment on harmonizing the type and accuracy of location information that regulated technologies and providers transmit to PSAPs. Should real-time voice communications be regulated differently than non-voice communications, data-centric services, and other technologies? For services and technologies that consumers use in combination with other services, devices, platforms, and networks, should the capabilities of the originating service provider and/or the device be determinative factors for applying a harmonized 911 framework? We seek comment on these alternatives and other approaches to harmonization that the Commission should consider.

29. If we proceed with harmonization, to what degree do we still need to maintain flexibility to tailor requirements to the capabilities of existing and emerging services and technologies? If consumers reasonably expect different communications services, devices, or platforms to provide different emergency capabilities, how should those expectations affect the Commission's harmonization analysis?

D. Legal Authority

30. The Commission's 911 framework rests on a number of complementary sources of statutory authority. As discussed in detail in the *NG911 Reliability Order* and other orders, the Commission has relied on multiple provisions of the Communications Act that establish its responsibility to promote the safety of life and property through wire and radio communications, administer the nationwide 911 system, regulate communications services in the public interest, and adopt regulations necessary to carry out these responsibilities.⁶⁵ The Commission's authority also draws from several statutes enacted specifically to advance the nation's emergency communications capabilities.⁶⁶ In addition to these express authorities, the Commission may adopt rules when it has subject matter jurisdiction under Title I of the Communications Act and doing so is reasonably ancillary to the effective performance of its statutory responsibilities.⁶⁷

⁶⁵ See, e.g., *NG911 Reliability Order* at **53-57, paras. 158-169 (citing, e.g., 47 U.S.C. §§ 151, 154(n), 201(b), 214(d), 218, 251(e)(3), 303); see also *NG911 Transition Order*, 39 FCC Rcd at 8206-8210, paras. 154-160; *E911 Scope Order*, 18 FCC Rcd at 25345-47, paras. 12-17; *Bounce-Back Order*, 28 FCC Rcd at 7587-7605, paras. 88-140.

⁶⁶ See, e.g., *NG911 Reliability Order* at **53-57, paras. 158-169 (discussing, e.g., the ENHANCE 911 Act of 2004, the New and Emerging Technologies 911 Improvement Act, the Twenty-First Century Communications and Video Accessibility Act, Kari's Law, and section 506 of RAY BAUM'S Act).

⁶⁷ *VoIP E911 Order*, 20 FCC Rcd at 10261-64, paras. 27-30; *Bounce-Back Order*, 28 FCC Rcd at 7600-05, paras. 128-140; *Ensuring the Reliability and Resiliency of the 988 Suicide & Crisis Lifeline; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; Implementation of the National Suicide Hotline Improvement Act of 2018*, PS Docket Nos. 23-5 and 15-80 and WC Docket No. 18-336, Report and Order, 38 FCC Rcd 6917, 6946, para. 51 & n.194 (2023). Title I extends to "all interstate and foreign communication by wire or radio," which is defined to include "the transmission of writing, signs, signals, pictures, and sounds of all kinds" by wire, cable, other like connection, or radio, "including all instrumentalities, facilities, apparatus, and services . . . incidental to such transmission." 47 U.S.C. § 152(a); 47 U.S.C. § 153(40), (59). See also *Am. Libr. Ass'n. v. FCC*, 406 F.3d 689, 692 (D.C. Cir. 2005) ("The Commission's general jurisdictional grant under Title I plainly

31. We seek comment on how these authorities apply in today's communications ecosystem and whether they remain sufficient to support the core objectives discussed in this *Notice*.⁶⁸ Does the increasing convergence of communications technologies affect how the Commission should interpret or apply its 911 legal authorities? To what degree should the Commission's legal analysis depend on the role an entity or technology plays in delivering or supporting emergency communications, rather than on its regulatory classification? Are there any areas in which the Commission's existing statutory authority over the functions and technologies supporting emergency communications is uncertain or incomplete? Under what circumstances would ancillary authority provide an appropriate basis for Commission action? Are there legal authorities, judicial decisions, or interpretive approaches the Commission should consider beyond those discussed in the *NG911 Reliability Order* and other orders cited herein?

IV. PROCEDURAL MATTERS

32. *Ex parte presentations.* To develop a comprehensive record, this proceeding shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.⁶⁹ 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 this proceeding should familiarize themselves with the Commission's *ex parte* rules.

33. *Comment period and filing procedures.* Pursuant to section 1.430 of the Commission's rules, 47 CFR § 1.430, 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). Commenters should refer to PS Docket No. 26-197 when filing in response to this *Notice of Inquiry*.

- *Electronic filers:* Comments may be filed electronically using the Internet by accessing the ECFS: <https://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 hand or messenger delivery, by commercial courier, or by the U.S. Postal Service. **All filings must be addressed to the Secretary, Federal Communications Commission.**
 - Hand-delivered or messenger-delivered paper filings for the Commission's Secretary

encompasses the regulation of apparatus that can receive television broadcast content, but only while those apparatus are engaged in the process of receiving a television broadcast.”).

⁶⁸ See Section III.A.

⁶⁹ 47 CFR § 1.1200 *et seq.*

are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. 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 courier deliveries (any deliveries not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
- Filings sent by U.S. Postal Service First-Class Mail, Priority Mail, and Priority Mail Express must be sent to 45 L Street NE, Washington, DC 20554.

34. *Availability of documents.* Comments, reply comments, and ex parte submissions will be publicly available via ECFS.

35. *Accessible formats.* 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 and Governmental Affairs Bureau at (202) 418-0530 (voice).

36. *Additional information.* For further information about this proceeding, please contact Daniel C. Spurlock, Attorney Advisor, Policy and Licensing Division, Public Safety and Homeland Security Bureau, at (202) 418-0212 or Daniel.Spurlock@fcc.gov.

V. ORDERING CLAUSE

37. Accordingly, IT IS ORDERED, pursuant to sections 1, 2, 4, 201, 214, 218, 225, 251(e), 301, 303, 316, and 332 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154, 201, 214, 218, 225, 251(e), 301, 303, 316, 332; the Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, as amended, 47 U.S.C. §§ 615 note, 615, 615a, 615a-1, 615b; and section 106 of the Twenty-First Century Communications and Video Accessibility Act of 2010, Pub. L. No. 111-260, 47 U.S.C. § 615c, that this Notice of Inquiry IS ADOPTED.⁷⁰

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

⁷⁰ Pursuant to Executive Order 14215, 90 Fed. Reg. 10447 (Feb. 24, 2025), this regulatory action has been determined to be not significant under Executive Order 12866, 58 Fed. Reg. 51735 (Oct. 4, 1993).