

**STATEMENT OF
COMMISSIONER MICHAEL J. COPPS**

Re: *Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules*, Notice of Proposed Rulemaking, GN Docket No. 11-117; *Wireless E911 Location Accuracy Requirements*, Third Report and Order, PS Docket No. 07-114; *E911 Requirements for IP-Enabled Service Providers*, Second Further Notice of Proposed Rulemaking, WC Docket No. 05-196

I was pleased to receive this item. E911 is a matter of ongoing and high priority attention for the Commission and today's proceeding is another step in the right direction. I don't need to dwell on the importance of E911 saving lives, protecting property, and preventing and discouraging crime. Location accuracy has gotten measurably better and certainly we have seen welcome increases in GPS-capable handsets and in network upgrades. That's good news for citizens. But even as we applaud that, we know our job is far from being done and we are still pushed by our public interest duty to move things along with all deliberate speed. This is another step in the right direction.

In light of the dynamic changes in technology, I support maintaining separate standards for both network and handset based location systems. I am particularly pleased that we are now requiring carriers to test and report to us, as well as to state 911 centers and PSAPs, whether or not carriers are hitting the mark for outdoor calls. This kind of real-world data can only make our diagnosis and our decisions better. And it will provide our Communications Security, Reliability, and Interoperability Council (CSRIC) important information that it needs as it considers its next steps and recommendations. I am hopeful CSRIC will provide the guidance we need toward the development of effective standards as a top priority matter. As I have stated many times before, vitally-necessary E911 infrastructure will best be built by the private and public sectors discussing together, planning together, working together and coming up with solutions together. It's not something either sector can accomplish alone.

I also want to reemphasize the priority of keeping clear focus on the matter of indoor testing. As more consumers cut the cord, their cell phones become the one and often only 911-capable device in their homes. Today we ask the right questions about indoor testing. I welcome that because it is just absolutely critical that we do not let this issue stall. The record clearly shows that my requests for reports and studies on in-building coverage go back many years in the E911 Location Accuracy docket.

I am also encouraged that we propose to expand E911 requirements to a greater set of VoIP users. It makes complete sense to me that VoIP users who can make calls to anyone would expect to be able to reach 911 in an emergency. I look forward to what I hope is a thorough record that tells us what consumers of this and other one-way services expect. So I appreciate the Notice's questions about our authority to extend E911 requirements to VoIP services for which callers can only call out.

But it should not stop there. To me public safety communication means *two-way* communications. Two-way communications become really important if an emergency call gets disconnected, goes dead for any reason, or if other emergency responders need to contact the caller. So I am pleased that we will also inform ourselves about what consumers need in the way of receiving calls *back* from emergency call centers. I understand that the Net 911 Improvement Act bolsters our legal authority in this area. Nevertheless, as I have said before, I believe the Commission should look comprehensively at the proper classification of VoIP. At the risk of

sounding like a broken record, our charge to protect the safety of the American people is clear and should never have to hinge on semantics or distinctions without a real difference.

The item also moves the ball forward for VoIP users by asking how we can ensure that location information is automatically updated. Today, that updating is a manual process. The issues are technically challenging, I understand that. But we live in a digital world and we here at the FCC must demand digital solutions to these critical problems. So here, too, I look forward to reviewing the record and to taking appropriate steps to move this critical issue expeditiously forward.

I want to thank the Public Safety bureau for bringing us this important item and helping us work through its many technical aspects. I commend the Chairman for his leadership in making these issues a priority and I thank him and my colleagues for working together to enhance the item as it made its way around the Eighth Floor.