

**STATEMENT OF
COMMISSIONER MIGNON L. CLYBURN**

Re: *911 Governance and Accountability*, PS Docket No. 14-193; *Improving 911 Reliability*, PS Docket No. 13-75.

Over the years, the Commission has adopted a number of items to promote the deployment of Next Generation or NG 9-1-1 networks. Designed appropriately, carriers will be able to provide state of the art emergency communications services using the most advanced IP technologies, allowing consumers to give first responders additional information, in more ways, during an emergency.

But last month's report on the 2014 multi-state sunny day outages was a reminder that any transition without the proper safeguards -- no matter how promising the technology -- could bring undesirable outcomes. In one case, a software coding error prevented more than 6,600 emergency calls from reaching 81 PSAPs in seven states (including my home state of South Carolina) and an inadequate alarm management brought about a significant delay in the identification of the software fault and full restoration of emergency service.

IP technologies can help carriers consolidate 9-1-1 infrastructure, across several states develop economies of scale, and consequently, dramatically lower the costs of delivering these critical services, resulting in significant public interest benefits, for which we should support. But no amount of efficiency of scale or scope can come at the expense of accountability, redundancy, and coordination -- all of which are fundamental to running any viable communications business. I focused on a few words at the beginning of paragraph seven of this Policy Statement and NPRM, which sum it up for me: "Our goal of proactive, measured accountability for reliable 9-1-1 completion" must identify which part of the 9-1-1 system has failed, which provider is responsible for those repairs, and who is responsible for providing timely and comprehensive information to PSAPs and the public. So, I commend Chairman Wheeler for circulating an NPRM that sends two clear messages. First, any new elements of 9-1-1 architecture or service should have the necessary safeguards, along with the appropriate governance mechanisms, to maximize reliability and protect public safety. And second, significant changes in service should be coordinated in a transparent manner with the Commission and with state and local authorities. Today, we propose common sense rules to implement those principles, which include changing the Commission's reliability certification rules to cover additional entities, requiring public notification for major changes in multi-state networks and designating certain service providers to be responsible for primary coordination in the event of an outage.

The days of 9-1-1 services solely provided by incumbent carriers seem to be far behind us, but the responsibility for the integrity of these critical networks remains the same. I wish to thank Admiral David Simpson and Eric Schmidt for their presentations. It's good to see my former colleague, Commissioner Phil Jones, here and his decision to travel from the state of Washington to be with us today underscores the importance of this action today.

Also, I want to recognize, David Furth, Erika Olsen, Nikki McGinnis, Clete Johnson, Tim May, Jeff Goldthorp, Lauren Kravetz, John Healy, Jerry Stanshine and one of the new Honors attorneys at the FCC, Brenda Villanueva, for their contributions on an item that recognizes precisely where the buck stops.