Before the
UNITED STATES SENATE
COMMITTEE ON COMMERCE, SCIENCE & TRANSPORTATION

Field Hearing on 9-1-1 and VoIP

Great Falls, Montana
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Testimony of Wanda McCarley

on behalf of the
ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-INTERNATIONAL (APCO)

Thank you Senator Burns for the opportunity to appear at this hearing today to discuss the critical issue of Voice over Internet Protocol (VoIP) services and the impact of those services on the provision of 9-1-1 services by our nation's public safety answering points (PSAPs).

I am here today in my capacity as the president-elect of the Association of Public-Safety Communications Officials-International, known as APCO, a professional association of over 16,000 individuals who manage and operate public safety communications systems for state and local government agencies across the nation. APCO has long been an active participant in FCC proceedings and congressional actions concerning public safety communications, addressing both radio spectrum issues and Enhanced 9-1-1 ("E9-1-1") matters that impact the operational requirements of PSAPs and the ability of emergency personnel to respond quickly and accurately to 9-1-1 calls.

I am also here today as the **Operations and Training Manager** for the Tarrant County, Texas 9-1-1 District where I work day-to-day on the challenges facing PSAPs.

APCO has long been deeply concerned with the ability of PSAPs to respond effectively to 9-1-1 calls made through VoIP providers. Early on, there were problems with VoIP calls being routed to the wrong PSAP, in some cases to PSAPs in distant states. Some VoIP providers adopted a strategy of routing "9-1-1" calls to PSAPs' ten-digit administrative numbers. In may cases, however, those administrative numbers are not answered by trained 9-1-1 call-takers. Indeed, calls to those administrative numbers often go into voice-mail, with a taped message informing callers to "hang up and dial 9-1-1 if this is an emergency." Unfortunately, that inability to get through to a 9-1-1 call-taker from a VoIP phone has led to dangerous delays in dispatching emergency personnel and, as was described in recent testimony before the FCC, tragic and perhaps avoidable deaths in several instances.

In May, the FCC addressed this problem with firm, but fair rules to ensure that VoIP 9-1-1 calls will be delivered to the correct PSAPs with the location information necessary for rapid emergency responses. APCO applauds FCC Chairman Martin and his colleagues for this critical decision. Absent FCC action, we would still be searching for solutions to protect the safety of the growing number of VoIP subscribers, most of whom choose their telephone service without realizing the potential difficulties of calling 9-1-1 and receiving emergency assistance.

Of course, still more needs to be done. The definition of VoIP services covered by the new rules many need to be refined, and we need to find ways for call-location information to be provided automatically, without caller intervention. We also need to find ways to locate VoIP callers who interconnect to the Internet from different physical locations. The FCC is currently examining these issues, and we urge the Commission,

VoIP providers and the public safety community to work together to find solutions as quickly as possible. We commend those VoIP providers who have elected to work cooperatively with public safety towards this goal.

APCO also believes that Congress and the FCC should look into the future, and adopt a rule to ensure that yet-to-be developed telephone technologies will be subject to appropriate 9-1-1 requirements. Unfortunately, VoIP took off in the marketplace before necessary 9-1-1 protections could be adopted by the FCC. That left the public at risk, even while they were enjoying the fruits of the new technology. APCO believes that all voice communications services that interconnect with the public switched telephone and use standard telephone numbering must provide full E9-1-1 capability.

We know that some have urged that PSAPs upgrade their systems to IP technology. While APCO strongly supports technological improvements for PSAPs, we urge extreme caution. First, under no circumstances should the current state of PSAP technology serve as an excuse for non-compliance by providers of VoIP or other "new" telephone services. Those services should be required to deliver 9-1-1 calls to the existing PSAP networks. Second, calls for PSAP system upgrades overlook the fundamental financial constraints facing PSAPs. Most operate on limited budgets with funding coming either from subscriber fees or local government appropriations. Either way, most PSAPs (many who have just completed upgrades to accept wireless E9-1-1 calls) cannot afford the enormous cost of switching to IP-based technologies. Thus, any discussion of upgrading PSAP capability must be accompanied by discussions of full funding for those upgrades.

Overall, funding for PSAPs is another critical issue that we believe Congress needs to help us address. It is essential that there continues to be a reliable source of funding for PSAPs even as we move towards new forms of telephone communication. One way or another, all users of the telephone network who might someday need to call 9-1-1 must contribute towards the cost of providing 9-1-1 services. APCO has created a task force to examine the future funding challenges for PSAPs, and has prepared a white paper on sustainable funding models for emergency telecommunications across the country. I would be happy to make copies of this white paper available to the Committee.

Senator Burns, I want to thank you again for this opportunity to appear at this important field hearing. APCO looks forward to working with you and other members of the Committee in addressing this and other critical public safety issues.