



Standards Committee T1 September 15, 2003

Telecommunications  
Industry Forum

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Ordering and Billing  
Forum

Network Interconnection  
Interoperability Forum

Re: Reply Comments to *Comment Sought on Petition for Rulemaking on Compliance by Carriers with Relevant Statutory Provisions on Disclosure of Customer Information in 911 Emergencies*, RM-10715, Public Notice DA 03-1952 (June 16, 2003)

Industry Numbering  
Committee

Dear Ms. Dortch:

Protection Engineers  
Group

The Alliance for Telecommunications Industry Solutions ("ATIS"), on behalf of its Emergency Services Interconnection Forum ("ESIF"), submits this correspondence in response to the Federal Communications Commission's ("FCC's" or "Commission's") Public Notice, in which the FCC seeks comment on a Petition for Rulemaking ("Petition") filed by the National Emergency Number Association ("NENA"), the Association of Public-Safety Communications Officials-International, Inc. ("APCO"), and the National Association of State Nine One One Administrators ("NASNA").<sup>1</sup> In the Petition, the parties requested that the Commission solicit public comment on the legal preconditions in relevant federal statutes to the release of customer specific information to Public Safety Answering Points ("PSAPs") in the course of responding to 911 emergency calls.<sup>2</sup> The specific purpose of this correspondence is to bring an ESIF initiative related to the transfer of customer specific information in the context of E911 call responses to the Commission's attention. Neither ATIS nor the ESIF is commenting on the issues raised in the Petition regarding the preconditions of or the interplay among the relevant federal statutes.

Standards Committee 05

Network Reliability  
Steering Committee

In April of 2003, the ESIF accepted Issue 23, Standardized Wireless Carrier Procedures/Contact Lists Needed for PSAP 9-1-1 Call Investigations. Through this issue, the ESIF will develop a national procedure for wireless carriers to provide current and prior customer information to PSAPs in emergency situations and/or cases of fraudulent use of 9-1-1. Additionally, the ESIF will develop a wireless contact list (e.g., company, name, department, voice and/or fax phone number(s)) for PSAPs to obtain current or prior customer information. Issue 23 was referred to ESIF Study Group E, where a solution will be worked via the consensus process and then presented to the ESIF for consideration and approval.<sup>3</sup>

Internetwork  
Interoperability Test  
Coordination Committee

Telecommunications  
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International Forum on  
ANSI-41 Standards  
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Interactive Voice  
Response Forum

TTY Forum

Administrative Council for  
Terminal Attachments

IMSI Oversight Council

Emergency Services  
Interconnection Forum

<sup>1</sup> *Comment Sought on Petition for Rulemaking on Compliance by Carriers with Relevant Statutory Provisions on Disclosure of Customer Information in 911 Emergencies*, RM-10715, Public Notice DA 03-1952 (June 16, 2003).

<sup>2</sup> See *In the Matter of Release of Customer Information During 9-1-1 Emergencies, Petition for Rulemaking*, RM-10715 (May 2, 2003).

<sup>3</sup> ESIF has seven active study groups (B through H). Further information on ESIF and its study groups, may be found at <http://www.atis.org/atis/esif/esifhome.htm>.

The ESIF anticipates completing this work by first quarter of 2004. Accordingly, once the issues regarding the relevant federal statutes are resolved, the industry will have a process and procedures for the exchange of the necessary customer specific information. We anticipate that the industry and public safety organizations will develop or agree to this procedure, and any applicable forms required for use by PSAPs nationwide.

Should you have any questions on this matter, please contact either myself at (202) 434-8847 or via email at [mcampbell@atis.org](mailto:mcampbell@atis.org), or Ed Hall, Vice President – Technology Development at (202) 434-8836 or via email at [ehall@atis.org](mailto:ehall@atis.org).

Sincerely,



Megan L. Campbell  
General Counsel

cc: Jim Nixon, ESIF Chairperson  
Astin Buchanan, ESIF Vice Chairperson  
Jim Lankford, ESIF Vice Chairperson  
Ed Hall, ATIS  
Rick Jones, NENA