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

In the Matter of

Single Network Future: Supplemental Coverage from Space ) GN Docket No. 23-65

Space Innovation ) IB Docket No. 22-271

Reply Comments of the
Alliance for Telecommunications Industry Solutions

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these replies in response to the comments made in response to the Further Notice of Proposed Rulemaking (FNPRM), released March 15, 2024, in the above-referenced dockets. In the FNPRM, the Federal Communications Commission (Commission) seeks comment on how to improve 911 service for Supplemental Coverage from Space (SCS) connections and protect radio astronomy. In these reply comments, ATIS agrees with the commenters to the FNPRM who acknowledge that the industry is in the best position to examine 911-related issues associated with SCS and urges the Commission to refrain from imposing additional routing or location accuracy requirements for SCS until the industry has had the opportunity to more fully examine this issue and provide recommendations.

I. Background

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information and communications technologies (ICT). ATIS’ diverse membership includes key ICT stakeholders—wireless, wireline, and VoIP service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational
Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications.

ATIS ESIF develops NG911 and location accuracy requirements and solutions. ESIF works with industry, governmental, standards, and public safety organizations to apprise them of its deliberations and decision and ensure the proper coordination of activities. ESIF identifies and resolves technical and operational issues to facilitate interconnection of emergency services networks with other networks (e.g., wireline, cable, satellite, Internet, etc.). The ESIF Next Generation Emergency Services and Messaging (NGESM) Committee develops standards and other documentation related to emergency services (i.e., E9-1-1 and Next Generation 9-1-1 with a focus on architectures, functions, and interfaces for North American communications networks. The NGESM Committee is also working on a set of minimum practical requirements to ensure consistent, valid, verifiable, and reproducible location data in a variety of access environments based on sound engineering and statistical practice. ATIS ESIF works closely with ATIS WTSC, which develops wireless radio access, system, and network solutions related to terrestrial and non-terrestrial wireless and/or mobile services and systems.

II. Comments

ATIS ESIF agrees with the commenters to the FNPRM who acknowledge that the industry is in the best position to examine 911-related issues associated with SCS. Space Exploration Holdings, LLC explains that the Commission “can best source and promote solutions to improve SCS location information through the same sorts of industry working groups that it has convened to develop E911.” Intrado Life & Safety, Inc. (Intrado) urges the

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1 Comments of Space Exploration Holdings, LLC at p. 4.
Commission to encourage stakeholder engagement to define location delivery requirement for SCS 911 and criteria for Emergency Call Centers tasked with handling SCS 911 calls, and to establish network guidelines for SCS 911. 2 T-Mobile USA, Inc. (T-Mobile) similarly recommends against the Commission adopting any standards governing interconnectivity for emergency calls and texts. T-Mobile notes that how emergency calls and texts are handled should be driven principally by technical capabilities and agreements between providers, explaining that standards-setting is typically driven by industry and should remain that way. 3

ATIS agrees with these commenters and urges the Commission to refrain from adopting additional 911 requirements for SCS until the industry has had the opportunity to more fully examine this issue and provide recommendations. ATIS ESIF intends to examine this issue and will update the Commission on developments.

III. CONCLUSION

ATIS ESIF appreciates the opportunity to respond to the comments to the FNPRM and urges the Commission to consider the input above.

Respectfully submitted,

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2 Comments of Intrado at pp. 7-9.
3 Comments of T-Mobile at p. 8.