

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

In the Matter of	)	
	)	
Facilitating Implementation of Next	)	PS Docket No. 21-479
Generation 911 Services (NG911)	)	
	)	
Improving 911 Reliability	)	PS Docket 13-75
	)	

**Comments of the  
Alliance for Telecommunications Industry Solutions**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Further Notice of Proposed Rulemaking (*FNPRM*), released March 28, 2025, in the above-referenced dockets. In the *FNPRM*, the Federal Communications Commission (Commission) proposes updates to its existing rules to ensure the resiliency, reliability, interoperability, and accessibility of Next Generation 911 (NG911) networks. ATIS supports the Commission’s goals of strengthening NG911 resiliency and interoperability.

In these comments, ATIS: (1) recommends that the Commission limit the definition of “covered service provider” to only those entities with direct relationship with 911 authorities and exclude from this definition those functions that are already regulated or internal; (2) supports the development of an interoperability best practice benchmark for testing and verification, but urges the Commission to defer technical and standardization issues to the industry for resolution; (3) notes that Rich Communications Service (RCS) is not currently a commonly accepted standard and explains RCS-related deployment and technical limitations; and (4) notes that updates are underway to the ATIS standard for Implementation of 3GPP Common IMS Emergency Procedures for IMS Origination & ESInet/Legacy Selective Router Termination to

support expanded NG911 messaging capabilities.

## **I. BACKGROUND**

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS' diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – 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. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS' Emergency Services Interconnection Forum (ESIF) develops NG911 and location accuracy requirements and solutions. ESIF works with industry, governmental, standards development, and public safety organizations (including PSAPs) to identify and resolve technical and operational issues to facilitate the interconnection of emergency services networks with other networks (e.g., wireline, cable, satellite, Internet, etc.).

## **II. COMMENTS**

### **A. Definition and Scope of Covered 911 Service Provider**

In the *FNPRM*, the Commission proposes to update the definition of “covered service provider” in its 911 reliability rules to specify how the rules apply to service providers that

control or operate critical pathways and components of NG911 networks.<sup>1</sup> The Commission proposes to specify certain NG911 capabilities that satisfy the “functional equivalent” capability language of the current rule, to modify the current rule regarding what “direct service” to a PSAP or other answering point means, and to add five new NG911 covered service provider categories.<sup>2</sup> ATIS ESIF urges the Commission to limit the definition of “covered service provider” to only those entities with direct relationship with 911 authorities.<sup>3</sup> The Commission also should exclude from this definition those functions that are already regulated or internal to originating service provider networks (e.g., LIS equivalents like LRFs and GMLCs). ATIS ESIF also urges the Commission to avoid duplicative obligations and respect architectural distinctions between wireline and wireless.

## **B. Promoting Interoperability Through Industry Collaboration**

The Commission proposes to adopt an interoperability best practice benchmark of testing and verification to support interstate interoperability<sup>4</sup> and to require covered service providers to submit an annual certification regarding network equipment conformance testing.<sup>5</sup> ATIS ESIF supports the development of an interoperability best practice benchmark for testing and verification, but urges the Commission to defer technical and standardization issues to the industry for resolution using open, consensus-based, stakeholder-driven processes. Standards-based solutions developed through these processes are essential to enhancing network resiliency and interoperability.

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<sup>1</sup> *FNPRM* at ¶ 3.

<sup>2</sup> *FNPRM* at ¶23.

<sup>3</sup> 47 CFR § 9.28 defines a “911 Authority” as a “State, territorial, regional, Tribal, or local governmental entity that operates or has administrative authority over all or any aspect of a communications network for the receipt of 911 traffic at NG911 Delivery Points and for the transmission of such traffic from that point to PSAPs.”

<sup>4</sup> *FNPRM* at ¶73.

<sup>5</sup> *FNPRM* at ¶74.

ATIS continues to lead standards development efforts in this area, including: (1) ATIS' Standard on Implementation of 3GPP Common IMS Emergency Procedures for IMS Origination and ESInet/Legacy Selective Router Termination (ATIS-0700015.v005), which defines the NG911 functional architecture and supports interoperability between originating networks and ESInets; and (2) the Joint ATIS/TIA Native SMS/MMS Text to 9-1-1 Requirements and Architecture Specification (J-STD-110v.002), which describes SMS/MMS Text-to-911 delivery and Text Control Center (TCC) operation.<sup>6</sup> These standards include considerations for IMS-based delivery of native multimedia emergency services, which encompass text messaging in an NG911 format and promote interoperability across IP-based networks and legacy systems during the transition to full NG911 deployment.

### **C. RCS and NG911 Messaging Standards**

In the *FNPRM*, the Commission seeks comment on the implementation of new interoperable messaging protocols, such as RCS and asks whether RCS is considered a “commonly accepted standard.”<sup>7</sup> ATIS ESIF does not believe that RCS is currently a commonly accepted standard because RCS has not been widely or consistently implemented in the U.S. and is not currently considered as part of ATIS' or NENA's NG911 standards. RCS also lacks interoperability testing for PSAP/ESInet integration and NG911 call transfer workflows. It is therefore uncertain if RCS will “enable interoperability,” as required by the Commission's definition of a “commonly accepted standard.”

ATIS ESIF also notes that there are deployment and technical limitations associated with RCS. Unlike IMS-based and SIP-based solutions, RCS operates in an “over the top” model and

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<sup>6</sup> These documents are available from <https://store.accuristech.com/atis/>.

<sup>7</sup> 47 CFR § 9.28 explains that “commonly accepted standards” are “standards developed by accredited organizations that enable interoperability and are open for public participation.”

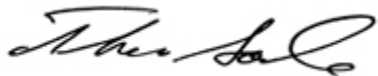
is separate from emergency voice systems. Current non-commonly accepted standards for RCS implementations fail to provide a backward compatible fallback (e.g., SMS text to 911). Current implementations of RCS are also inconsistent with published standards. RCS is incompatible with recent Commission rules for NG911 deployment (i.e., Phase 1 and Phase 2 rules). RCS applications would not receive emergency prioritization. Additionally, certain RCS applications require an underlying data connection.

Work is underway in ATIS ESIF to enhance its standard on the Implementation of 3GPP Common IMS Emergency Procedures for IMS Origination and ESInet/Legacy Selective Router Termination (ATIS-0700015.v0005) to support expanded NG911 messaging capabilities. This work will consider features like read receipts, typing indicators, and multimedia, which can be extended to NG911 messaging. A key principle underlying this work is that NG911 messaging enhancements must remain compatible with SMS delivery. ATIS ESIF supports the development of a solution that avoids deployment delays and maintains interoperability with existing NG911 infrastructure. As a leading standards development organization (SDO) in the 911 ecosystem, ATIS ESIF urges the Commission to leverage the work of industry forums, such as ESIF, to ensure technically sound and widely accepted NG911 implementations. When technical issues can be resolved by the industry via open, stakeholder-driven, consensus-based standards, the Commission should defer to those standards.

### III. CONCLUSION

ATIS ESIF appreciates the opportunity to provide its input to the *FNPRM*. ATIS ESIF urges the Commission to maintain a 911 Authority-facing definition of “covered service provider” and avoid expanding this definition to include functions that are already regulated or internal to originating service providers. ATIS ESIF supports the development of an interoperability best practice benchmark for testing and verification but urges the Commission to defer technical and standardization issues to the industry for resolution using open, consensus-based, stakeholder-driven processes. ATIS ESIF also notes that RCS is not currently a commonly accepted standard and that there are technical and deployment limitations associated with RCS. Finally, ATIS ESIF is pleased to report that that updates are underway to its standard for Implementation of 3GPP Common IMS Emergency Procedures for IMS Origination & ESInet/Legacy Selective Router Termination to support expanded NG911 messaging capabilities.

Respectfully submitted,



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