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

In the Matter of	)	
Modernizing the 911 Framework	)	PS Docket No. 26-197

COMMENTS OF THE ALLIANCE

FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Notice of Inquiry (*NOI*), released October 1, 2026, in the above-referenced docket. In the *NOI*, the Federal Communications Commission (Commission) examines its 911 framework in light of rapidly emerging new technologies. In these comments, ATIS supports: (1) the extension of the Commission's 911 framework to services or devices that can communicate with 911 and where there is a reasonable consumer expectation of emergency access; and (2) the harmonization to the extent technically feasible of the Commission's 911 obligations across voice, text, video, and other NG911-capable communications consistent with commonly available standards.

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; standards development

organizations; industry trade associations; 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.

ATIS' Emergency Services Interconnection Forum (ESIF) develops NG911 and location accuracy requirements and solutions. ESIF works with industry, governmental, standards development organizations, and public safety organizations (including public safety answering points (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

In the *NOI*, the Commission seeks input on the existing 911 scope criteria, which focus on whether a service or device: (1) offers interconnected, real-time, two-way voice service; (2) gives users a reasonable expectation of access to 911 and E911; (3) competes with traditional CMRS or legacy wireline service; and (4) can feasibly support E911.[1]

The Commission asks whether "real-time, two-way voice communication" continues to appropriately identify the services and technologies that should be subject to the Commission's 911 framework.[2] ATIS ESIF understands the Commission's desire to revisit whether two-way voice communication should be the sole basis for determining whether a service or device falls within that framework. A voice-only threshold may exclude technologies that can meaningfully

[1] *NOI* at ¶13 *et seq*.
[2] *NOI* at ¶16.

support access to 911 and/or the transmission of emergency information.[3] Modern IP-enabled communications promise to allow users to initiate both standalone two-way text, and/or to transmit non-voice data (images, video clips, and structured data) concurrently during an established emergency call interconnection.

ATIS ESIF understands the Commission's desire to expand the scope of its 911 framework. We suggest the Commission focus on whether a service or device creates reasonable consumer expectations that it can be used for emergency communications and whether inclusion would advance reliable access to public safety.

The Commission also asks whether interconnection with the PSTN should remain a defining factor in determining whether a service or device falls within the Commission's 911 framework.[4] ATIS ESIF understands the Commission's desire to revisit whether PSTN interconnection should no longer be the only appropriate litmus test. The defining factor should not be strictly limited to whether a service or device is interconnected with the PSTN but should also consider whether these new services have the same level of reliability and integrity of the PSTN because anything less is counter to what the consumer should be able to expect from emergency communications. As the communications ecosystem continues to evolve away from the traditional circuit-switched networks and toward IP-based and NG911 architectures, the Commission should consider whether a service can reliably access or reasonably be expected to access 911. Such an approach would advance the Commission's goals, avoid over-regulation of a one-size-fits-all approach, and be consistent with the Commission's recognition that it is dangerous to make rules based on a regulator's predictions about the future of technology.

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[3] Alyssa's Law is legislation that requires public elementary and secondary schools to install **silent panic alarms** directly linked to law enforcement to speed up emergency response times during active threats. *See* https://alyssas-law.com and https://www.noonlight.com/blog/how-alyssas-law-is-reshaping-the-future-of-school-safety.

[4] *NOI* at ¶17.

In applying a capability-based approach on services such as VoIP, the Commission should be mindful of the fact that IP-based communications involve multiple layers, from the hardware layer up to the content layer, each of which is controlled by a different actor. In particular, the Commission should be careful to distinguish between the application layer and other layers, specifically the hardware and transport layers, such as the neutral access network provider. Often the application-layer provider determines the 911 caller's location information. Therefore, the Commission must consider whether 911 obligations attach only to the provider of the application (service) that originates the emergency communication, or whether a neutral access network provider has 911 obligations as well. The Commission should consider whether the providers of the underlying broadband, Wi-Fi, or other access services; or if providers of customer premises equipment, such as routers, gateways, and wireless access points have 911 obligations when they merely provide internet access and all the access network provider can see is encrypted traffic. Extending 911 obligations to providers of transport and access-layer facilities that have no awareness of 911 traffic that they carry would not improve the information delivered to PSAPs because network operators have no control over the originating application or its location capabilities.

Finally, the Commission seeks comment on harmonizing 911 requirements across service categories.[5] ATIS ESIF encourages the Commission to balance harmonization of the Commission's 911 requirements with recognition of the differences between different networks and technologies. ATIS standards are creating a roadmap based on a common pathway for differing communications access methods along with cellular voice, Wi-Fi calling, advanced IP messaging, multimedia sharing, multi-way video (e.g., to support sign language). Future

[5] *NOI* at ¶27.

standards work will consider the requirements for all communications modalities – including video, rich media and file transfers (both one-way and two-way), and text. To the extent it is technically feasible, new services should be consistent with the handling of voice calls e.g., location determination, conveyance, routing requirements, etc. and based on commonly accepted standards. Additional data (e.g., service, provider, device) sent with an NG911 request should be based on commonly accepted standards, as specified in the Commission's rules.[6]

Harmonization of core emergency communications requirements to the extent technically feasible will promote interoperability across networks, devices, service providers, and PSAPs, thereby improving the reliability and effectiveness of NG911 services. For example, consistent treatment of location and related data across communication modalities will also simplify implementation, testing, and operational support, reducing unnecessary complexity and compliance costs for industry while improving predictability for emergency service providers. Different communications modes present unique technical/physical (e.g., spectrum) characteristics; thus, requirements should be tailored and supported by demonstrated operational capabilities to avoid undermining 911 reliability. Establishing a common baseline framework will help ensure that consumers receive a consistent emergency services experience regardless of the communications modality used, while enabling innovation to occur within a clear and predictable regulatory structure. Moreover, standards-based requirements promote interoperability and scalability. This allows new services and technologies to be integrated into the NG911 environment without creating fragmented or proprietary approaches that could undermine public safety outcomes.

Specifically, ATIS ESIF urges the Commission to anchor its modernized 911 framework

[6] 47 CFR §9.27(a).

in globally recognized, consensus-based industry standards – such as those developed by ATIS, 3GPP, IETF, and NENA – rather than mandating technology-specific or proprietary implementations. Open IP and IP Multimedia Subsystem (IMS) standards already define robust, interoperable transport mechanisms. These standards define the mechanisms for transporting real-time voice and are in the midst of evolving to support transporting session-based and non-session-based text, high-resolution images, video, structured file transfers, and concurrent voice-and-multimedia sessions across converged access networks, including CMRS, 3GPP-compliant Wi-Fi calling, and 3GPP NTN. In this context, the Commission should consider the physical limitations of spectrum available for each kind of service, such as differences between Wi-Fi Calling and IMT and between MSS, SCS, and NTN. Relying on these established technical standards ensures that critical emergency capabilities – such as automated location conveyance, callback and session-reestablishment information, authenticated public safety messaging, and bidirectional delivery confirmations – function seamlessly from the originating device through the originating service provider to the NG911 Delivery Point and PSAP. Furthermore, these standards support dynamic capability discovery and fallback mechanisms, ensuring that advanced multimedia and messaging features are invoked when a receiving PSAP is technically ready to process them while gracefully falling back to baseline text or voice when legacy PSAP limitations exist. Standards-based messaging is pre-installed as the default messaging app on the OS across most mobile consumer devices, so users already have access to it and do not need to download or register a third-party app before an emergency happens.

ATIS and 3GPP are both working on additional emergency-service use cases for the IMS Data Channel as part of its ongoing Release 21 work. These scenarios include sharing interactive building maps and real-time indoor location to support fire evacuation, as well as enabling

multimedia consultations with pharmacists supported by AI-assisted medication identification. ATIS is also requesting that 3GPP address gaps in IMS-based text emergency communications as part of its Release 21 work, starting with two use cases: international roamers who cannot speak and need the visited network to route emergency messages to the appropriate local PSAP and return responses without relying on their home network, and individuals without a valid subscription who need to initiate a text-only IMS emergency session and discover whether the network supports this capability. Although 3GPP TS 22.101 already permits text-only emergency sessions and requires support for unauthenticated users where mandated by local regulation, corresponding architecture and procedures remain incomplete.

By referencing commonly accepted standards to define baseline functional expectations across voice, text, and rich media, the Commission can maintain a strict technology-neutral regulatory framework that prevents ecosystem fragmentation, supports accessibility for individuals with disabilities, and allows emergency communications capabilities to evolve organically alongside commercial network and device advancements.

III. CONCLUSION

ATIS ESIF appreciates the opportunity to provide input to the *NOI*. ESIF supports the Commission's efforts to modernize the Commission's 911 framework and urges the Commission to focus its 911 framework on services or devices that can reliably and consistently communicate with 911 and where there is a reasonable consumer expectation of emergency access. ATIS ESIF also supports the harmonization of the Commission's 911 requirements across voice, text, video, and rich media communications consistent with globally recognized, consensus-based industry standards and commonly accepted standards as defined by the Commission.

Respectfully submitted,



Thomas Goode
General Counsel
Alliance for Telecommunications Industry Solutions
1200 G Street, NW
Suite 500
Washington, DC 20005
(202) 628-6380

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