



April 18, 2008

Renee J. Jenkins, Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street, 13<sup>th</sup> Floor  
Columbus, Ohio 43215-3793

Re: Case No. 08-287-TP-UNC; Petition filed by NENA/APCO requesting rules and standards governing Next Generation 9-1-1 in a competitive 9-1-1 market.

To Whom It May Concern:

The 9-1-1 Industry Alliance ("9IA") was established in December 2005 by a group of prominent leaders<sup>1</sup> in the public safety industry, and the association has experienced impressive growth since then, now comprised of 20 leading companies<sup>1</sup>. 9IA's members are providers of technology solutions and services to the public safety industry, and the group's ultimate mission is to provide the public with the best emergency communications available by playing an important role in assisting policy makers with complex choices regarding advanced 9-1-1 alternatives.

9IA agrees with the comments made by the joint Petitioners in this case and believes a rule making is urgently needed; and 9IA clearly disagrees with the comments and suggestions made by Cincinnati Bell and AT&T. The task of saving lives and property is the most important responsibility of government authorities including the Commission, and that charge is reason enough to promptly address issues confronting Ohio today related to next generation 9-1-1 and competitive 9-1-1 services. It is the position of the 9-1-1 Alliance that competition improves service to the public and legislated monopolies are not in the public's best interest. In a next generation 9-1-1 environment, Ohio can benefit directly by allowing companies to offer lower prices, and innovative technologies to better handle emergency request from the public.

In March 2007, 9IA engaged ColoComm Group, LLC to analyze the state of 9-1-1 services in the United States and to conduct an independent evaluation of the state of 9-1-1-related technology, governance, and funding issues. ColoComm's team of experts include Dale Hatfield, former chief of the Office of Engineering and Technology at the FCC, as well as Phil Weiser and Brad Bernthal, both professors in the telecommunications practice at the University of Colorado. These authors were encouraged to survey a broad geographic cross-section of public safety agencies,

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<sup>1</sup> Member companies represented by 9-1-1 Industry Alliance include: InterAct Public Safety Systems, TruePosition, TCS – TeleCommunication Systems, Northrop Grumman, Hitech Systems, TKC Consulting Group, 9-1-1 ETC Inc., Motorola, Avaya, Emergitech Public Safety Software, Positron Public Safety Systems, Intergraph, Intrado, L.R. Kimball and Assoc., Nine One One Inc., PlantCML, RedSky, S5 Wireless, TriTech Software Systems, Wrightline LLC.

legislation, and influencers in the field and to provide their own perspective concerning 9-1-1 issues. Consequently, this report relies on and pulls together the insights and information gleaned from a series of first-person interviews with governmental and industry players, a review of relevant literature and reports, and an analysis of relevant statutes and regulations. A copy of the report<sup>2</sup> is attached. Among its key findings relevant to this proceeding: consumer technology has long surpassed that of the 9-1-1 system and state leadership for building a next generation environment is badly needed. State governments need to take immediate action.

There is nothing inconsistent or duplicative about the fact that Ohio's local chapters of NENA and APCO are pressing for adoption of rules facilitating competition and advanced technology. NENA's NG Partners Program can operate concurrently with the Commission's work, already underway, to understand how adjusting rules is appropriate, and the two efforts can benefit from one another. Ohio is already leading the way, e.g., by giving authority to at least one "competitive" 9-1-1 service provider to operate in the state. If the Commission follows the suggestion of these incumbents, who have virtually nothing to gain from a rule making and have everything to gain by delaying it, Ohio can't realistically expect to address these acute issues for several years despite the fact that technology and associated regulatory issues face us all today.

Even though wireless phone technology is now over 20 years old, Ohio is one of only a few States that have no method for helping 9-1-1 centers across their state deal with and fund these calls, which represent over 55% of all requests from the public. This is also an issue the incumbent local exchange carriers (including Cincinnati Bell and AT&T) have delayed for years and has hurt Ohio's public safety ability. A competitive next generation environment in Ohio can help with new forms of technology before consumers adopt them.

9IA urges the Commission to act on an accelerated basis by instituting a rule making proceeding, beginning with a workshop that Commission staff can oversee and participate in; establishing goals and time frames for completion of the workshop; and issuing proposed rules and standards as promptly as can be accomplished.

Thank you for your consideration.

Sincerely,

A handwritten signature in purple ink, reading "Jeff Robertson".

**Jeff Robertson**, Executive Director  
9-1-1 Industry Alliance  
600 Cameron Street, Suite 309  
Alexandria, VA 22314  
[www.911alliance.org](http://www.911alliance.org)

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<sup>2</sup> The 2008 Health of the 9-1-1 Network in the United States report can also be found at: [www.911alliance.org](http://www.911alliance.org).

**This foregoing document was electronically filed with the Public Utilities**

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Summary: Comments 9-1-1 Industry Alliance comments on allowing competition in offering 9-1-1 services in Ohio. The 9IA urges the commission to no longer delay next generation 9-1-1 in Ohio. Ohio is currently ranked as one of the lowest states in the nation for 911 technical and funding ability and this requires immediate PUC action. electronically filed by Mr. Jeff Paul Robertson on behalf of 9-1-1 Alliance and Mr. Jeff Robertson