

**FHH Telecom Law**  
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**FCC Reviews 911 Requirements**

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Americans have used 911 as their emergency telephone number for nearly forty years. Today, 98% of landline phones have access to 911 service. States and localities generally provide the rules for wireline 911 service, while the FCC regulates 911 for wireless phones. A new rulemaking seeks to determine whether changes are needed to keep up with technology.

Most of the concerns focus on the newest wireless retail offerings, particularly resold and pre-paid wireless service, disposable wireless phones, and personal data assistants (Palm organizers and the like) that access wireless voice service. These are generally novel ways of marketing the services of an underlying carrier, and so may be adequately covered by existing rules. But the FCC also asks whether 911 obligations should apply to Telematics service, which provides vehicles with built-in direction, concierge, and emergency services, and to Mobile Satellite Services and Maritime Telecommunications Systems.

In the wireline environment, many large buildings and organizations use in-house, multi-line phone systems called PBXs. Some PBX systems cannot report the location of the handset making a 911 call to the emergency services provider, but instead identify only the location of the central PBX unit. This problem can hinder a prompt emergency response. The FCC seeks comment on whether it calls for new regulations.

Comments are due on February 3, and reply comments on February 28.