

# FCC 05-116: E911 Requirements for IP-Enabled Service Providers Para 25

Date: **2006-11-17**

Authors:

Name	Company	Address	Phone	email
G. Scott Henderson	Research In Motion	Suite 100 102 Decker Court Irving, TX 75062 USA	+1 972 791 2569	shenderson@rim.com

**Notice:** This document has been prepared to assist IEEE 802.16. It is offered as a basis for discussion and is not binding on the contributing individual(s) or organization(s). The material in this document is subject to change in form and content after further study. The contributor(s) reserve(s) the right to add, amend or withdraw material contained herein.

**Release:** The contributor grants a free, irrevocable license to the IEEE to incorporate material contained in this contribution, and any modifications thereof, in the creation of an IEEE Standards publication; to copyright in the IEEE's name any IEEE Standards publication even though it may include portions of this contribution; and at the IEEE's sole discretion to permit others to reproduce in whole or in part the resulting IEEE Standards publication. The contributor also acknowledges and accepts that this contribution may be made public by IEEE 802.16.

**Patent Policy and Procedures:** The contributor is familiar with the IEEE 802 Patent Policy and Procedures <<http://iee802.org/guides/bylaws/sb-bylaws.pdf>>, including the statement "IEEE standards may include the known use of patent(s), including patent applications, provided the IEEE receives assurance from the patent holder or applicant with respect to patents essential for compliance with both mandatory and optional portions of the standard." Early disclosure to the Working Group of patent information that might be relevant to the standard is essential to reduce the possibility for delays in the development process and increase the likelihood that the draft publication will be approved for publication. Please notify the Chair <[r.b.marks@ieee.org](mailto:r.b.marks@ieee.org)> as early as possible, in written or electronic form, if patented technology (or technology under patent application) might be incorporated into a draft standard being developed within the IEEE 802.16 Working Group. **If you have questions, contact the IEEE Patent Committee Administrator at <[patcom@ieee.org](mailto:patcom@ieee.org)>.** Scott Henderson, Research In Motion

## FCC 05-116: E911 Requirements for IP-Enabled Service Providers

25. While the rules we adopt today apply to providers of all interconnected VoIP services, we recognize that certain VoIP services pose significant E911 implementation challenges. For example, the mobility enabled by a VoIP service that can be used from any broadband connection creates challenges similar to those presented in the wireless context. These “portable” VoIP service providers often have no reliable way to discern from where their customers are accessing the VoIP service. The Commission’s past experience with setting national rules for 911/E911 service is informative, and we expect that our adoption today of E911 service obligations for providers of interconnected VoIP service will speed the further creation and adoption of such services, similar to the manner in which the Commission’s adoption of E911 service obligations in the wireless context helped foster the widespread availability of E911 services for mobile wireless users, where it formerly was not possible for wireless carriers automatically to determine the precise geographic location of their customers. We recognize and applaud the progress that has already been made to ensure that VoIP customers have E911 services. We stress, however, that should the need arise, we stand ready to expand the scope or substance of the rules we adopt today if necessary to ensure that the public interest is fully protected. Indeed, the *NPRM* that accompanies today’s Order seeks comment on whether further intervention is necessary in this area.