

**ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-
INTERNATIONAL, INC.
NATIONAL EMERGENCY NUMBER ASSOCIATION
NATIONAL ASSOCIATION OF NINE ONE ONE ADMINISTRATORS**

January 9, 2002

The Honorable Michael Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20005

Dear Chairman Powell:

We are writing to request that the Commission adopt a Notice of Inquiry as soon as possible to examine the very serious problems posed by unintentional wireless telephone calls to 9-1-1, which are clogging many Public Safety Answering Points (“PSAPs”) and diverting scarce resources necessary to respond to real emergencies. We believe that the Commission, wireless carriers, handset manufacturers, PSAPs and subscribers must give immediate attention to this matter. Although we understand that technical personnel in the Wireless Telecommunications Bureau and perhaps other Commission bureaus or offices have been looking into this matter, we strongly recommend that the investigation take the more formal and comprehensive approach that a Notice of Inquiry would permit.

Unintentional wireless calls to 9-1-1 occur most often when a handset button set up for speed-dialing to 9-1-1 is pressed accidentally, often without the knowledge of the subscriber. This can occur, for example, when a pocket phone is pressed against a chair, sat upon, or compressed in a purse or brief case. When such a 9-1-1 call is generated, the PSAP call-taker receiving the call often cannot determine whether the call is real or accidental, and must stay on the line for a period of time, tying up scarce PSAP resources. While a call-back number may be available in some instances (where at least Phase I of the E9-1-1 rules has been implemented), making that call and verifying that there is no emergency further diverts personnel and resources.

Many wireless handsets were previously distributed to customers with a “one-digit speed-dial” pre-selected for “9-1-1,” and some handsets are and continue to be distributed with a designated “9-1-1” button. We understand that many vendors and carriers have discontinued these practices and products on a going-forward basis. However, we remain concerned that some vendors and manufacturers have not made these necessary changes. Moreover, the problem of unintentional calls to 9-1-1 will persist so long as older handsets remain in use and consumers fail to take preventive steps, such as disengaging one-digit speed dialing of 9-1-1 and/or using the keypad locking function available on many handsets.

Therefore, we recommend that the Commission initiate an inquiry to gauge the extent of this problem and to solicit comment as to whether regulatory action is necessary or appropriate. Such an inquiry could also further efforts to educate consumers regarding the problem, and to help publicize preventive steps.

We stand ready to work with the Commission on this important issue. Please contact us should you or your staff have any questions.

Respectfully submitted,



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cc: The Honorable Kathleen Abernathy
The Honorable Michael Copps
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