

Before the  
National Telecommunications and Information Administration  
Washington, DC

) )  
Development of the Nationwide Interoperable ) Docket No. 120928505-2505-01  
) )  
Public Safety Broadband Network ) )

**COMMENTS OF INTRADO INC.**

Intrado Inc. (Intrado) submits its comments in response to the National Telecommunications and Information Administration’s (NTIA) Notice of Inquiry (NOI) in the above referenced proceeding.<sup>1</sup>

**I. Introduction**

Intrado, founded in 1979, developed much of America’s emergency communications technology and has supported the delivery of emergency services for more than thirty-two years. Intrado pioneered location and routing solutions for wireline, wireless and voice over internet protocol (VoIP) 9-1-1 calls and SMS text messaging to 9-1-1. Intrado also led the development of next generation 9-1-1 (NG9-1-1) products and services—with early deployments in Washington, Vermont and Florida. Today, Intrado provides the core of the nation’s 9-1-1 infrastructure by managing the majority of the nation’s caller location and selective routing information and by supporting the delivery of several hundred million 9-1-1 calls every year.

Additionally, Intrado has forged alliances with industry-leading technology providers for the delivery of advanced public safety solutions. Intrado combines its secure internet protocol (IP) network, which supports multi-media capabilities between citizens and PSAPs, with call information and media-rich data developed by Intrado’s partners for use by PSAP operators *and* first responders. Through these partnerships, information that increases situational awareness—

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<sup>1</sup> *Development of the Nationwide Interoperable Public Safety Broadband Network*, 77 Fed. Reg. 60680 (October 4, 2012).

such as premise information and medical monitoring—can be conveyed in conjunction with 9-1-1 calls and assist in efficient and safe emergency responses.

Intrado has been actively involved in supporting the evolution and advancement of the nation’s emergency services ecosystem through actively participating in key government and industry activities, including (a) advocating before federal, state and local authorities, (b) providing technical expertise in standards development for E9-1-1 and NG9-1-1 with the Alliance for Telecommunications Industry Solutions (ATIS), the Telecommunications Industry Association (TIA), and the National Emergency Number Association (NENA), (c) developing minimum technical interoperability requirements for first responders with the Emergency Response Interoperability Center (ERIC),<sup>2</sup> and (d) developing the Statement of Requirements (SoR) for FirstNet in National Public Safety Telecommunication Counsel’s (NPSTC) Broadband Working Group.

Intrado supports the architectural concepts proposed by the First Responder Network Authority (FirstNet) for the Nationwide Interoperable Public Safety Broadband Network (NPSBN) and a National Applications Store (NAS)—and is committed to the success of both. Intrado’s comments are intended to provide information about and suggested focus on the existence of NG9-1-1 products and solutions in the 9-1-1 ecosystem and the need for interoperability of those products and services with the NPSBN. Interoperability will require consideration of PSAPs and the NG9-1-1 products and services they employ in all phases and aspects of development of the network and associated applications. In addition, Intrado urges

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<sup>2</sup> The mission of ERIC, “to establish a technical and operational framework that will ensure nationwide operability and interoperability in deployment and operation of the 700 MHz public safety broadband wireless network” is the precursor and underpinning of the *Recommended Minimum Technical Requirements to Ensure Nationwide Interoperability for the Nationwide Public Safety Broadband Network*, that was prepared by the Technical Advisory Committee for First Responder Interoperability (Final Report May 22, 2012).

FirstNet to foster an open and multi-vendor network environment and to ensure that safe, trustworthy and cost-effective devices and applications are used on the NPSBN.

## **II. FNN Conceptual Network Design Model**

### **A. Inclusion of PSAPs and NG9-1-1**

FirstNet indicated that it intends to measure success of its network deployment county-by-county.<sup>3</sup> Inherent in a county-by-county approach and consistent with the Spectrum Act is the clear and unambiguous integration of PSAPs with the NPSBN from the outset.<sup>4</sup> The 9-1-1 system is one that begins with citizens who request emergency services and flows through to first responders who will utilize the NPSBN to respond with assistance. The PSAP, supported by evolving networks and technology, is the linchpin of the system, connecting the caller and relevant information to the first responder.<sup>5</sup> When defining long-term architectural concepts, the FirstNet Board should consider 9-1-1 calling, end-to-end, as an inseparable element of the emergency services ecosystem along with the need for interoperability throughout that system, including PSAP operations.

### **B. Competition and Interoperability on the NPSBN**

The FirstNet architecture must allow for a multi-vendor environment and, at the same time, it must ensure interoperability regardless of the underlying network provider. FirstNet must guard against proprietary extensions embedded in what may otherwise appear to be open devices, networks, and/or systems. Interoperability will be thwarted if NPSBN users—wittingly or unwittingly—employ assets that are not multi-vendor, multi-mode or multi-protocol in nature.

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<sup>3</sup> *Meeting of the First Responder Network Authority, September 25, 2012*, Transcript at 47.

<sup>4</sup> *Middle Class Tax Relief and Job Creation Act of 2012*, Pub. L. No. 112-96 (2012) § 6206(b)(2)(C).

<sup>5</sup> In NG9-1-1 networks, information such as graphics and video can be provided in conjunction with a 9-1-1 call.

### **III. Conclusion**

Intrado believes that the NPSBN will be critical infrastructure for the nation's entire 9-1-1 system and looks forward to a measured, open and inclusive approach to its design, deployment, and operation.

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Respectfully submitted,

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