Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Modernizing the 911 Framework) PS Docket No. 26-197

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net ("VON") Coalition[1] hereby submits these comments in response to the Notice of Inquiry ("NOI") in the above-referenced docket regarding whether the Commission's 911 rules need to be updated in response to changes in technology.[2] As discussed below, the Commission's existing 911 rules are appropriately focused on emergency calling for the Public Switched Telephone Network (PSTN) and balance the expectation of callers and capabilities of call takers, public safety organizations and originating voice service providers ("VSPs"). The Commission should not, at this time, consider expanding or imposing new 911 obligations as the nation's emergency response network transitions to much needed Next-Generation 911 ("NG911") capabilities.

BACKGROUND

The NOI seeks comment on the core objectives of the 911 framework, including that the public has access to reliable, resilient and consistent 911 communications; that public safety can receive emergency communications and promoting the development of innovative and improved

[1] The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of internet communications. See www.von.org.
[2] *Notice of Inquiry,* PS Docket No. 26-197, FCC 26-63, (rel. October 1, 2026).

emergency communications technologies, regardless of platform.[3] The NOI further seeks comment on the classes of services and devices that may be expected to comply with 911 rules, with an emphasis on supporting interconnected, real-time, two-way voice services,[4] as well as the feasibility of those services to comply with FCC rules.[5] The Commission also seeks comments on the current state of consumer expectation for 911 functionality across services and technologies.[6] The Commission further seeks comments on whether it should harmonize 911 requirements across service categories and harmonization approaches.[7]

DICUSSION

For more than 30 years,[8] the FCC has undertaken comprehensive emergency calling rulemakings to address calling scenarios that reach beyond traditional wireline services. Fundamental to all emergency calls is an ability to reach someone who can help and the ability to provide useful information - a caller's telephone number, to initiate callbacks if needed, and location information to assist in response and route calls to the most appropriate public safety answering point ("PSAP").

The Commission has required interconnected VoIP providers to support E911 calling, including the delivery of the location information, for more than 20 years, and providers have done so in many cases with limited access to the PSTN and location information generated by a network or device.[9] More recently, the Commission expanded obligations to support the

[3] NOI at para. 12.
[4] Id. at paras. 16-18.
[5] Id. at paras. 23-25.
[6] Id. at paras. 19-21.
[7] Id. at paras. 26-29.
[8] Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 18676 (1996) (adopting rules requiring 911 access for wireless calls).
[9] Report and Order, 20 FCC Rcd 10245 (2005).

availability of more precise location information (dispatchable location)[10] and for interconnected text messaging providers to support text messaging to 911.[11] As technology and use cases for emergency calling have evolved, interconnected VoIP providers and third parties have consistently developed products and solutions to both support compliance with FCC rules and improve the delivery and availability of 911 communications.

As the Commission contemplates whether additional changes are needed, VON makes the following recommendations:

1) All emergency calling obligations ("911") must be anchored to public switch telephone network ("PSTN") calling with a telephone number. Congress clearly spoke in 1999 when it designated 911 as the emergency telephone number.[12] Had Congress wanted to include non-PSTN-enabled services, it would have designated States and Public Safety Answering Points to provide additional methods for reporting an emergency to appropriate authorities and requesting assistance.[13]

The Commission should not extend 911 obligations beyond services with a telephone number that provide calling over, and interconnected with, the PSTN. The administrable test is whether the service provides PSTN dial tone and the ability to make and receive calls to and from NANP telephone numbers.

VON opposes expanding 911 obligations to those services that use a telephone number as an identifier but that do not enable PSTN dial tone, including those with public or private IP addresses. In these use cases, consumers do not have an expectation that these services could be

[10] 47 CFR § 9.11(a)(5)(iii)(B).
[11] Report and Order, 29 FCC Rcd 9846 (2014).
[12] Public Law No: 106-81.
[13] Id.

used to dial 911.[14] Moreover, there would be no statutory authority to impose 911 obligations on those services that did not use telephone numbers and may have no (or only a limited) ability to make calls over the PSTN. The Commission's ancillary authority, which was used to support its 2005 decision applying 911 obligations on interconnected VoIP providers, is not an open-ended basis to reach in-app communications, general-purpose software, operating systems, or cloud infrastructure.[15]

2) The Commission should continue to support the use of emergency call centers. The availability of accurate location information, while constantly improving, may not always allow a VSP to determine the appropriate PSAP for the termination of a 911 call. In those circumstances when the caller's location is uncertain, a single national emergency call center must be permitted to answer a call, verify the caller's location, and warm-transfer the call to the most appropriate PSAP. This option should always remain available to VSPs, and is more than industry convenience, as it provides a valuable public safety benefit by confirming location before transfer, reducing misroutes, filtering accidental and automated calls, and handling nomadic and sometimes cross-border and international callers.[16]

3) Evolving location information requirements. The way to ensure that service providers have access to the best possible location information is when it's derived from a variety of sources: the device, the network or enterprise network topology, the last location at which a

[14] VON asserts that consumer expectations alone should not be a reason to impose 911 obligations.

[15] VON recommends that the Commission explicitly state that in-app only communications, video conferencing and messaging all fall outside of any 911 obligation unless the service affirmatively offers emergency access by dialing 911 or is otherwise marketed as a telephone substitute.

[16] NOI at para. 9, fn. 32 (noting the security challenges faced by PSAPS from international emergency calls made during the 2026 FIFA World Cup).

device registered on a network, or location entered or confirmed by the user. Combining these sources gives service providers the flexibility needed to provide the best possible location and, as needed, an ability to estimate, through probability and proximity to other known locations, where the caller is located and to convey source, freshness, and confidence information to a PSAP. An outdated registered address will be worse than less precise but current location information. Commission rules should therefore encourage dynamic, multi-source approaches and avoid penalizing providers where device, network, user, or customer controls prevent acquisition of a precise location. Supplying location data to support an emergency calling service should be encouraged; however, doing so should not convert a device, operating system, or data source into a regulated originating service provider.

Of critical importance, and to promote the seamless nationwide emergency communications infrastructure Congress sought to achieve when designating 911 as the universal emergency number, location requirements should not rely on public safety entities rebuilding master street address guides or imposing community- or state-specific address validation, similar to what is transpiring in Massachusetts.[17] Emergency calling, as Congress intended, should work as a nationwide solution, and the Commission should take steps to avoid replicating problems of the past that resulted in anticompetitive behavior and thousands of differing standards built on local control. Most consumers and enterprises rely on communications services that are not tied to a fixed location or used solely in one location. Mobile, nomadic, and cloud-based services of today and tomorrow need an emergency response system to work nationwide, not merely in one community. VON urges the Commission to rely on national standards, including geodetic

[17] See, NCTA Petition for Waiver, PS Docket No. 25-143 (filed October 28, 2026) (asking the Commission to extend the Phase 2 NG911 compliance date in Massachusetts until April 30, 2027).

coordinates, the GIS-based validation used in NG911, and confidence data to avoid a patchwork of state and local validation and readiness requirements.

Furthermore, in the enterprise and multi-line telephone system ("MLTS") context, the Commission should appropriately impose obligations on the enterprises controlling those systems. Service providers can supply capabilities and instructions but cannot guarantee outcomes where an enterprise fails to accurately configure or maintain emergency addresses, network topology, session border controllers, or other critical equipment or software. In those instances, providers can only provide the best location information they have available.

As the Commission considers evolving technology,[18] it should define roles without expanding jurisdiction. This includes the use of AI agents and 911 calling. In those cases, the Commission should regulate the emergency calling function rather than the artificial intelligence generally and not treat an AI model or the cloud layer beneath it as an originating service provider. Providers have an obligation to enable emergency calling and route necessary information for response (location, call back number) to the correct point of entry (including through uses of warm transfer). PSAPs should not dictate technology choices on providers but those decisions should be standards-based while allowing for innovation and capabilities that can improve response and use of valuable resources.

[18] Regarding emerging technologies, VON supports safe test mechanisms (such as test numbers – 933) rather than encouraging live 911 test calls, and the Commission should not require providers to originate text, video, or other modalities their services do not offer. The Commission should encourage testing sandboxes to support emerging opportunities with AI and emergency calling.

CONCLUSION

VON respectfully urges the Commission to act in accordance with the recommendations herein.

Respectfully submitted,

VOICE ON THE NET COALITION

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