1) Under Basic 911 service on page 3:
   Basic 911 service does not provide a PSAP operator with a 911 caller's phone number or information about the physical location of the caller.
   Basic 911 service sometimes does provide caller ID.

   Clarification – if caller ID is sent by the service provider and the customer is equipped to receive Caller ID, Caller ID will be displayed to the caller.   For Phase 0 wireless calls (calls that are delivered through the PSTN) most WSPs will send the mobile phone number as Caller ID.

2) Under Enhanced 911 service on page 3:
   Enhanced 911 or "E911" systems provide a PSAP with the telephone number (referred to as automatic number identification, or "ANI") and information about the location of a 911 caller (referred to as automatic location identification, or "ALI").
   E911 service also includes the selective routing of a 911 call; this is not a feature of basic 911.

   Clarification – selective routing is the process of routing a 911 call to the proper PSAP based on ESN (emergency services number) information. Selective routing allows callers who reside in the same telephone exchange but in different communities or counties to have their 911 call directed to the appropriate PSAP, rather than all calls in an exchange routing to the same PSAP regardless of location.

   ESN – Emergency Services Number – a number that represents a unique combination of responding agencies (Law, Fire and EMS). Each telephone number in the 911 Database is assigned an ESN for call routing purposes.

   Traditional wireline and static VoIP telephone numbers – ESN information is based on the MSAG (master street address guide), which is a tabular database that contains street names and high/low address ranges to determine the proper PSAP that would accept the 911 call and dispatch law/fire/EMS resources.

   Wireless and Nomadic VoIP pseudo ANIs – each service provider is assigned a range of pseudo ANIs for each primary PSAP.   The 911 call will route based on the ESN assigned to the pANI provided by the provider at the time of call delivery.

3) Under Wireless 911 Calls on page 4, the description of how wireless ANI is delivered:
   The telecommunications provider sends the PSAP the 10-digit phone number of the mobile phone plus a 10-digit number assigned to the face of the hot tower receiving the call (called "10/20 digits").
   a) The pANI (pseudo ANI/511 #) is used to tie voice to data in the dynamic ALI process; there is a not a specific pANI assigned to each sector of each tower. Each WSP is assigned a range of pANIs for each primary wireless PSAP and can use any pANI in the assigned range for any sector of any tower for that primary PSAP.

      Clarification – for wireless and nomadic VoIP 911 calls, ALI data is not stored in the 911 Service Provider's ALI database like traditional wireline records. It is shared between the wireless or VOIP provider and the 911SP through a process called dynamic ALI, in which ALI data is delivered to the 911SP at the time of call, who then delivers it to the PSAP. Pseudo ANI information (wireless uses numbers in the 511 NXX and nomadic VOIP uses numbers in the 211

NXX) is stored in the 911 database and assigned to each service provider for each PSAP that will be receiving those calls. The wireless or VOIP provider sends a pseudo ANI at the time of call, which the 911 Service Provider uses to selectively route the 911 call and associate a specific call with ALI data delivered via the dynamic ALI process to provide to the PSAP.

Each WSP or VSP is assigned a range of pANIs for each primary PSAP. The WSP or VSP is responsible for sending the appropriate pANI with the call for proper call routing, but can use any pANI assigned in the range provided for a specific PSAP.

b) All AT&T PSAPs in Wisconsin are using 10-digit ANI, meaning the pANI is what is provided as ANI and the caller's cellular number is delivered in the dynamic ALI process. I am not aware of any WSP in Wisconsin delivering 20 digits as ANI at this time, to AT&T or any other 9-1-1 SP in Wisconsin.

Clarification – WSPs have the option of delivering 1 or 2 telephone numbers in the wireless 911 call process depending on the standards of each 911 service provider, state, etc. If a WSP sends 1 telephone number (10 digits), it is generally the pANI associated with that call. If a WSP sends 2 telephone numbers (20 digits), it is the pANI plus the calling party number of the cell phone.

In Wisconsin, all AT&T PSAPs receive only the pANI information in the ANI field. The CBN of the cell phone is delivered through the dynamic ALI process as part of the ALI record.

4) Under Wireless 911 calls on page 4, the length of time to determine location:
There is a delay of approximately 12-15 seconds between when a wireless 911 call is placed and the additional information about the location of the caller is available to the PSAP.
a) I believe the FCC rules on wireless 911 allow the WSPs up to 30 seconds to determine location of the wireless caller.

Clarification – the FCC rules mandate that the WSP provide a location estimate at 30 seconds. While some PSAPs have found that information may be available sooner than 30 seconds into a call, the recommended WSP times for re-bidding a wireless 911 call are: 30 seconds for initial re-bid, 60 seconds each re-bid thereafter if the caller is moving.   12-15 seconds is not a standard or a recommended time frame.

5) Under VOIP on page 5, description of static VOIP:
Static VoIP systems have a defined customer location because they use a fixed medium such as traditional cable lines or phone lines to transmit telecommunications. These calls use the wireless 911 data format but are routed over the landline 911 network. Therefore, 10/20 digit capability is required for PSAPs to capture all of the data that accompanies such a call.
a) This is not correct – static VOIP phones have fixed locations and as such, have standard landline-type records in the 911 Database. They do not require a PSAP to have Enhanced MF (what this brief refers to as 10/20 digits) in order to receive the ALI information.
b) Carriers who choose to deliver 911 calls in a nomadic fashion (whether the location is fixed or not) will deliver the call similar to a wireless 911 call, using a pseudo ANI (specifically an ESQK – Emergency Services Query Key – for VOIP/211 #) and the dynamic ALI process.

Clarification – there are 2 different kinds of VoIP phone service: static, which has a fixed location (example: phones through cable service), and nomadic, in which a subscriber can travel with their phone service (example: Vonage, Magic Jack).

 VSPs may choose to deliver 911 calls from static VoIP phone customers in 1 of 2 ways:

Static – the call is delivered to the PSAP like a landline call and the ALI record associated with the telephone number is loaded into the 911 Database much like a traditional landline phone record; ALI displays to the call taker at a PSAP as if it were a landline phone. This type of call delivery does not require a PSAP to be capable of receiving ALI in a wireless format.

Nomadic – the call is routed to the PSAP using pseudo ANI information (for nomadic VoIP, the 211 NXX is used) and the ALI record associated with the telephone number is presented to the 911SP at the time of the call through the dynamic ALI process. This requires the PSAP to have enhanced MF capabilities (10-digit ANI and an ALI format that supports the delivery of X/Y coordinate information).