

SEPTEMBER 24, 2020

## VPS Consulting Memo

# **911 Reliability Certification**

### Summary

#### Overview

The Annual 911 Reliability Certification is due October 15, 2020.

#### Background

Beginning October 15, 2015, all "Covered 911 Service Providers" are required to certify annually that they have taken reasonable measures to provide reliable 911 service related to (1) 911 circuit diversity, (2) central office backup power, and (3) diverse network monitoring.

The annual certification rules apply to any entity that provides 911, E911, or NG911 capabilities such as call routing, Automatic Location Information (ALI), Automatic Number Information (ANI), or the functional equivalent of those capabilities directly to a PSAP, a statewide default answering point, an appropriate local emergency authority, or to any entity that operates one or more central offices that directly serve a PSAP.

For the purpose of the rules, a central office directly serves a PSAP if it: (1) hosts a selective router or ALI/ANI database, (2) provides functionally equivalent NG911 capabilities, or (3) is the last service-provider facility through which a 911 trunk <u>or administrative line</u> passes before connecting to a PSAP. A Covered 911 Service Provider is meant to encompass entities that provide capabilities to route 911 calls and associated data such as ALI and ANI to the appropriate PSAP, but *not entities that merely provide the capability for customers to originate 911 calls*.

## **Additional Information**

911 is a critical piece of telecommunications and the Enforcement Bureau has begun to issue fines and penalties for those failing to complete the annual certification. Therefore, it is important that each carrier carefully assess

whether the FCC's 911 annual certification rules applies to them. It is also important to note that a carriers Covered 911 Service Provider status may change from one year to the next.

For more information on this issue or if you would like VPS guidance, please contact the following members of the Vantage Point Solutions team:

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