

Reminder: FCC Annual 911 Reliability Certification Due October 15, 2019

September 23, 2019

Please be reminded of the upcoming due date for the FCC filing requirement listed below:
Annual 911 Reliability Certification

Providers of 911, E911, or NG911 capabilities in the United States must file an annual certification of the provider's compliance with the 911 reliability requirements in Section 12.4 of the Federal Communications Commission (FCC) rules. The annual certification, due by **October 15, 2019**, is filed electronically and must include a signed attestation from a corporate officer with supervisory and budgetary control over the provider's network operations. The FCC's online filing portal - available at <https://apps2.fcc.gov/rcs911/> - is open to receive certification filings.

Who Must File

The annual certification requirement applies to any "covered 911 service provider," which includes entities that provide 911, E911, or NG911 capabilities such as call routing, automatic location information (ALI), or automatic number identification (ANI); and/or operates one or more central offices that directly serve a PSAP. The term "covered 911 service provider" does not include: (i) PSAPs or other governmental authorities that provide 911 capabilities, or (ii) entities that offer the capability to originate 911 calls where another service provider delivers those calls and other information to the appropriate PSAP.

Report Overview

Covered 911 Service Providers must certify to their efforts to provide reliable 911 service with respect to three key elements:

1. **911 Circuit Audits.** Filers certify whether, within the past year, they have performed circuit audit tasks such as conducting diversity audits of critical 911 circuits and eliminating single points of failure in the critical circuits.
2. **Central Office Backup Power.** Filers operating central offices that directly serve a PSAP, must certify regarding matters such as how backup power is provisioned, e.g., by fixed generators, portable generators, batteries, etc., and whether the equipment is tested and maintained in accordance with the manufacturer's specifications.
3. **Diverse Network Monitoring.** Filers must certify whether, within the past year, they have conducted diversity audits of elements such as the aggregation points used to gather network monitoring data in each 911 service area; and of the monitoring links between aggregation points and network operation centers for each 911 service area.

Covered 911 Service Providers are permitted to implement and certify an alternative measure for any of the specific certification elements as long as the provider can show how the alternative measure can sufficiently mitigate risk of failure.

For more information regarding this client advisory, please contact your usual Kelley Drye attorney.