



January 29, 2021

John Merrill
Director, First Responders and Detection (Acting)
U.S. Department of Homeland Security
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Mr. Merrill,

The undersigned organizations write concerning the DHS Next Generation 9-1-1 (NG9-1-1) Interoperability Testing Program. As originally conceived, we were supportive of its intended purpose to develop NG9-1-1 interoperability testing, employing the terms “interoperability” and “NG9-1-1” as defined in the [Next Generation 9-1-1 Act of 2019](#).

Public safety is all too aware that efforts to date at deploying pre-NG9-1-1 elements are failing to meet these definitions and have put us on the wrong path. Inspired in part by these problems, we formed a [coalition](#) to promote legislative proposals that address the needs and concerns of public safety, including the need to highlight the imperative for interoperability of NG9-1-1 systems. One of our unifying principles states:

“NG9-1-1 should be technologically and competitively neutral and use commonly accepted standards that do not lead to proprietary solutions that hamper interoperability, make mutual aid between agencies less effective, limit choices, or increase costs.”

The status quo is unacceptable. Deployments are limited, proprietary, excessively costly, and non-interoperable. Public safety should be able to specify in requests for proposals (RFPs) and expect NG9-1-1 vendors to provide interoperable solutions that also ensure backwards compatibility with previous systems, just like consumers and subscribers to public safety broadband networks enjoy. Therefore, our organizations welcomed the effort by DHS to promote full end-to-end interoperability for NG9-1-1.

However, we understand that some members of the Testing Program’s subcommittees are maneuvering to redirect this effort in the wrong direction of “conformance” and “compliance” testing to the NENA i3 specification rather than end-to-end interoperability testing. Part of the issue with the status quo is that vendors have for many years already been marketing products as being “i3 compliant,” and claiming compliance with i3 in response to RFPs. In addition, on seven separate occasions beginning in 2009 industry has been conducting “pay-to-play” conformance testing, in the form of NENA Industry Collaboration Events (ICE). Instead of leading to interoperability among systems, these vendors have deployed proprietary, non-

interoperable implementations labeled as “i3 compliant.” For vendors to now seek to use DHS funds to operate conformance and compliance testing to i3 would be both an unwise use of limited federal dollars and contrary to the actual needs of the public safety community.

Until an end-to-end, interoperability test is complete that verifies that the solutions do in fact provide interoperable communications regardless of vendor, jurisdictional boundary, or equipment, any conformance testing will at best only show that one proprietary element can communicate with another proprietary element. Conformance testing would provide little to no benefit to public safety agencies who need interoperable communications, not a series of interconnected, proprietary elements. Additionally, public safety agencies might be further misled about the capabilities of products that have passed conformance testing.

For these reasons, we firmly believe that any testing program developed by this group must be directed at achieving full, end-to-end NG9-1-1 interoperability. Further, this program should ensure impartiality and promote opportunities for vendors who have innovative solutions that provide interoperability. In this way, DHS’s program would have greatest potential to serve the needs of emergency communications centers and the law enforcement, fire, and EMS agencies they serve, not to mention the public that we are all responsible to.

We appreciate your attention to our concerns and are available to help address any questions that you may have.

Sincerely,

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