Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

January 23rd, 2017

In re Onvoy Spectrum, LLC, Petition for Waiver of Section 52.15(g)(2) of the Commission’s  
Rules Regarding Access to Numbering Resources, WC Dockets Nos. 13-97, 07-243, 04-36;  
CC Docket No. 99-200; PS Docket No. 10-255.

Dear Ms. Dortch:

I write to provide brief comments of the National Emergency Number Association,  
Inc., in support of Onvoy Spectrum, LLC’s petition for access to wireless p-ANI numbering  
resources in the context of providing a VoIP-type service.

As we read Onvoy’s petition, it does not seek a waiver of the authorization requirement  
contained in § 52.15(g)(2) of the Commission’s rules. Rather, we read the petition to seek  
a determination that the North American Numbering Plan Administrator’s (i.e., Neustar’s)  
criteria for determining whether an applicant is, in fact, authorized extend beyond the  
requirements of the rule. To the extent that our reading is consistent with Onvoy’s intent,  
we support the petition, and urge the Commission to grant the requested relief.

NENA cannot fault Neustar for attempting to establish sensible criteria for the evaluation  
of requests for wireless p-ANI resources. Clearly some gating criteria must be established  
for this purpose. As a practical matter, however, there is little to no technical difference  
between wireless and VoIP p-ANI resources. CMRS and VoIP technologies are rapidly  
converging, and approaches such as Onvoy’s, which enables dynamic location capabilities  
for VoIP services, are a natural part of that convergence. Because NENA sees tremendous  
potential for improvements in the quality of 9-1-1 service available to VoIP subscribers  
through this and similar approaches, we agree that waiver relief is warranted. Moreover,  
we urge the Commission to create a presumption that authorized VoIP service providers  
who wish to provide dynamic location data to PSAPs may receive access to the requisite  
numbering resources if they meet the criteria suggested in Onvoy’s petition.

Please contact the undersigned with any questions.

Respectfully submitted,

Telford E. Forgety, III; “Trey”  
Director of Government Affairs