

APCO International Guidance on Requesting 9-1-1 Traffic in IP-Based Format

Purpose: On March 25, 2025, the Federal Communications Commission (FCC) [announced](#) that 9-1-1 authorities can make requests to originating service providers (OSPs) to begin the process of delivering 9-1-1 traffic in IP-based format to delivery points designated by the 9-1-1 authority. This document informs APCO members of the FCC requirements regarding these requests and provides guidance on engaging with originating service providers.

Background: In July 2024, the FCC established [new rules](#) to advance the transition to NG9-1-1 by requiring the OSPs to deliver 9-1-1 traffic in IP-based format upon receiving a valid request from a 9-1-1 authority. As part of the valid requests, 9-1-1 authorities must designate the delivery points for OSPs to deliver IP-based 9-1-1 traffic and certify that they have met certain readiness criteria. Upon receipt of a valid request, nationwide OSPs will have six months to comply with the request and non-nationwide OSPs will have twelve months to comply. The OSPs are responsible for the costs associated with delivering 9-1-1 traffic in IP-based format.

Phases for Delivery of 9-1-1 Traffic in IP-Based Format

- **Phase 1 Compliance:** Once a 9-1-1 authority submits a valid request, the OSP must deliver 9-1-1 traffic in an IP-based format. The OSP must ensure that the 9-1-1 traffic reaches the appropriate delivery points, including completing connectivity testing to confirm successful delivery.
- **Phase 2 Compliance:** In addition to Phase 1 requirements, the OSP must ensure compliance with commonly accepted standards, including embedding location data in call signaling. The OSP must also implement necessary infrastructure to verify location information and conduct connectivity testing to confirm compliance.

Process for Submitting a Valid Request to Originating Service Providers

9-1-1 authorities have two options for making requests to OSPs to begin delivering 9-1-1 traffic in IP-based format:

1. Via the FCC's Centralized Registry: 9-1-1 authorities can submit a completed [valid request form](#) in PS Docket No. 25-143 through the [Electronic Comment Filing System](#) (ECFS).
 - Steps for filing in ECFS:
 1. For "Proceeding(s)," input 25-143, hit enter.
 2. For "Type of Filing," use the drop-down menu and select either "REQUEST" or "OTHER."
 3. Complete the required (*) information on the webpage. Note that ECFS is a public database and, therefore, 9-1-1 authorities should refrain from including sensitive or confidential information in the valid request form.
 4. Upload your completed valid request form.

2. Direct Notification to OSPs: 9-1-1 authorities may send written requests directly to the relevant OSPs. 9-1-1 authorities are not required to utilize any specific form when directly notifying OSPs, but must include certification that they meet the readiness criteria.

Readiness Criteria to be Met When Making Valid Requests to Originating Service Providers

For requests to the OSPs to be valid, 9-1-1 authorities must meet specific readiness criteria for each phase of implementation.

- Phase 1 Readiness Criteria:
 - Infrastructure in Place: The 9-1-1 authority must have all necessary systems installed and operational to receive and transmit 9-1-1 traffic in an IP-based format.
 - Commitments from Providers: Agreements must be in place with ESInet, NG9-1-1 Core Services, and/or call-handling equipment providers needed to complete connectivity testing.
 - Authorization to Request Service: The 9-1-1 authority must be legally permitted to submit a request for IP-based delivery of 9-1-1 traffic.
 - Delivery Point Designation: The 9-1-1 authority must identify the designated delivery points for IP-based 9-1-1 traffic.
- Phase 2 Readiness Criteria:
 - Standards-Compliant Infrastructure: The 9-1-1 system must be fully operational and comply with commonly accepted standards.
 - IP Connectivity: The 9-1-1 network must connect to a functioning NG9-1-1 Core Services network that includes location validation and location information server capabilities, or their functional equivalent.
 - Provider Commitments: Agreements with service providers must be in place to facilitate connectivity testing.
 - Delivery Point Confirmation: The authority must confirm or update the designated delivery points for Phase 2 service.

Additional Information

- An originating service provider may dispute the validity of a request from a 9-1-1 authority by filing a petition with the FCC within 60 days of receiving the request from the 9-1-1 authority.
- 9-1-1 authorities and originating service providers can mutually agree to alternative terms, such as different timelines for compliance. If such an alternative agreement is reached, the originating service providers must notify the FCC within 30 days.
- Additional information on the FCC's rules can be found on the FCC's [NG911 Services Webpage](#).