Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Modernizing the 911 Framework	)	PS Docket No. 26-197
	)	

COMMENTS OF THE IJIS INSTITUTE

I. INTRODUCTION AND SUMMARY

The IJIS Institute (IJIS) appreciates the opportunity to comment on the Commission's Notice of Inquiry examining the 911 framework.[1] IJIS agrees with the Commission that the 911 ecosystem is "becoming more diverse and data-driven" (¶2). IJIS offers a perspective centered on the information that now reaches emergency communications centers (ECCs)[2] and how it is used once it arrives: to dispatch, to inform responders, and to serve as the record for what follows.

That perspective responds in particular to the *Notice*'s question about the extent to which the Commission should consider "the reasonable expectations of 911 Authorities, 911 telecommunicators, and emergency responders" (¶20). IJIS offers its views as context for the record and identifies, where relevant, matters the Commission may wish to consider in any future rulemaking. These describe outcomes rather than obligations; IJIS takes no position on which entities should bear any resulting requirements or on the reach of the Commission's authority.

In summary:

1. The information reaching ECCs now extends well beyond 911 calls, so the Commission's evaluation of new technologies and services could consider both the public's ability to reach 911 through them and the ECC's ability to receive and use what they deliver.

2. Inputs that arrive without a caller to explain them rely on the context they carry, which bears on the Commission's questions about scope and a baseline set of functional 911 capabilities.

---

[1] *Modernizing the 911 Framework*, PS Docket No. 26-197, Notice of Inquiry, FCC 26-63 (rel. Oct. 1, 2026) (*Notice*). Paragraph citations in these comments refer to the *Notice*.

[2] IJIS uses "emergency communications center" throughout, consistent with the Commission's NG911 definition at 47 CFR § 9.28 and with current practice in the field, reflecting that centers now receive far more than answered calls. The term "PSAP" appears where quoting the *Notice*.

3. Information captured at intake becomes a foundation for the response and for later justice processes, so its integrity, including whether it was generated or classified by AI, matters well beyond the ECC.

4. Where the Commission's framework may end, standards bodies, governance, and procurement practice carry the work and objectives forward, and rules that reference commonly accepted standards, as the Commission's NG911 definition contemplates, help align them and support interoperability across all the inputs ECCs receive.

II. ABOUT THE IJIS INSTITUTE

The IJIS Institute is a neutral, nonprofit collaboration network that brings together public safety and justice practitioners, national associations, industry, government, and academia to address information-sharing, policy, and technology challenges.[3] IJIS was formed in 2001 from an industry working group convened at the invitation of the U.S. Department of Justice's Bureau of Justice Assistance. Its work proceeds through advisory committees, working groups, and task forces in which practitioners and solution providers work side by side, including an Emergency Communications and Response Advisory Committee led jointly by industry and 911 authority leadership.

Emergency communications has been part of IJIS's work for more than a decade. IJIS helped develop unified functional requirements for computer-aided dispatch (CAD) in 2012, co-convened a joint emergency communications task force in 2013, and contributed to the Emergency Incident Data Document, which laid the groundwork for today's standard for exchanging incident data. Beginning in 2015, IJIS worked with the Department of Homeland Security Science and Technology Directorate on making text-to-911 usable for people with limited English proficiency, and it oversaw the Directorate's CAD-to-CAD interoperability project, which developed and piloted a specification for exchanging incidents between CAD systems.[4] IJIS's current work includes a Center of Excellence on artificial intelligence for justice, public safety, and security; an

[3] IJIS Institute, https://ijis.org.

[4] *IJIS Institute and APCO International Publish CAD "Standards" Document* (Sept. 20, 2012), https://www.pr.com/press-release/442000; *IJIS Institute and APCO Launch Joint Emergency Communications Task Force* (Mar. 15, 2013), https://www.pr.com/press-release/478732; *DHS Taps IJIS Institute to Oversee Program for Public Safety Agencies*, ExecutiveGov (Feb. 3, 2021), https://www.executivegov.com/articles/dhs-taps-ijis-institute-to-oversee-program-for-public-safety-agencies; IJIS Institute, *IJIS Member to Support CAD Interoperability Pilots*, https://ijis.org/?p=4314; IJIS Institute, *CAD-to-CAD Pilot Site Implementation*, https://ijis.org/cadtocadpilot/; NENA/APCO, *Emergency Incident Data Document (EIDD) Information Document*, NENA/APCO-INF-005.1 (2014), https://cdn.ymaws.com/www.nena.org/resource/resmgr/standards/nena_apco-inf-005.1_eidd_201.pdf; IJIS Institute, *Text-to-911 Translation Standards*, https://ijis.org/ijis-key-initiatives/text-to-911-translation-standards/; DHS Science and Technology Directorate, *DHS S&T, IJIS Host Text-to-911 TechFest on Google Campus* (July 10, 2019), https://www.dhs.gov/science-and-technology/news/2019/07/10/news-release-dhs-st-ijis-host-text-911-techfest-google-campus.

AI playbook developed with national public safety organizations; and working groups on AI, cybersecurity, and criminal justice data quality, among others.[5]

IJIS's reach across 911, law enforcement, fire and EMS, courts, prosecution, corrections, health and human services, school safety, and homeland security gives it a view of where emergency information travels after it reaches the ECC.

III. IJIS'S WORK AND THE INPUTS REACHING ECCS

IJIS's comments draw on two current efforts and on its broader experience in emergency communications. Through its Emergency Communications and Response Advisory Committee, IJIS is exploring how the growing range of non-voice and automated data entering ECCs should be governed. IJIS is also working with practitioners and industry to describe the outcomes NG911 systems should achieve. That work builds on the same end-to-end definition of NG911 the Commission has codified,[6] for use as agencies and solution providers plan, acquire, and operate systems.

These comments use "inputs" for any information that reaches an ECC, voice or non-voice. Non-voice inputs include text, data, images, video, and sensor readings. The range of non-voice inputs is wide and growing, and these innovations extend the reach of 911 and give telecommunicators and responders newly available information. For purposes of these comments, inputs fall into three groups that relate differently to the *Notice*:

- **Individual.** Inputs generated by or for a specific person, such as 911 calls and texts, supplemental location and other data sent with a call, crash detection, and alerts from wearables. These fall within the *Notice*.[7]
- **Community.** Inputs generated on behalf of the public or a community, such as school panic alarms, gunshot detection, and environmental sensors. Some reach 911 directly, while others go first to law enforcement, a real-time crime center, or emergency management. To the extent they initiate contact with 911, they fit the *Notice*'s observation that "[a]ny technology or service that can initiate a connection with 911 impacts 911 Authorities" (¶18), even where the person helped may be unaware an alert was sent.
- **Response operations.** Information generated by public safety agencies' own systems and personnel, during a response or in support of one, such as drone and body-worn camera video, license plate reader alerts, real-time crime center feeds, and field data

[5] IJIS Institute, *The IJIS Institute Launches the Center of Excellence on Artificial Intelligence for Justice, Public Safety, and Security (JPSS)* (Jan. 8, 2025); IJIS Institute, *The IJIS Institute Publishes the Artificial Intelligence Playbook for Justice, Public Safety, and Security Professionals* (Apr. 8, 2025); IJIS Institute, *Working Groups*, https://ijis.org/working-groups.
[6] 47 CFR § 9.28.
[7] *Notice* ¶¶5–8, 16, 21.

shared over public safety broadband networks. The *Notice* does not address these inputs specifically, though it recognizes that 911 Authorities are incorporating "emergency-response data services" and other technologies that support "the receipt, processing, analysis, and exchange of emergency information" (¶10). IJIS includes them because they converge on the same incident record as the inputs the *Notice* addresses, so the Commission's choices about those inputs shape how readily ECCs can combine the two (Section V.C).

Inputs also differ in how they arrive: with a 911 call, including supplemental data delivered alongside it, or independent of any 911 call, whether through direct feeds into CAD, third-party platforms, or other systems, or relayed by staff, as is common for real-time crime center information.

Within the individual and community groups, many inputs, such as crash detection, fall detection, and gunshot and environmental sensor alerts, are generated by a device or system without a person initiating them, much like the communications the *Notice* describes as initiated "without the consumer ever pressing 'send'" (¶9). These comments refer to them as automated inputs.

IV. CORE OBJECTIVES

IJIS agrees that the three core objectives in ¶11 are enduring and remain the right foundation for the Commission's 911 policies. In response to ¶12's question whether any should be "modified, updated, or weighed differently," IJIS's observation concerns the second objective.

Paragraph 12 frames the inquiry around "the public's ability to access emergency assistance." Access is where an emergency begins, and the assistance the public receives increasingly draws on information beyond the call itself. The second objective, "[s]upporting the ability of public safety authorities to receive emergency communications and related information needed to deliver timely and effective emergency services," captures this. It also tracks the Commission's own NG911 definition, which includes systems that acquire and integrate additional information and support sharing it among ECCs and emergency response providers.[8]

When the Commission evaluates a new technology or service, the relevant question is therefore not only whether the public can reach 911 through it, but also whether the ECC can receive, trust, and use the information it delivers.

For the Commission's consideration. IJIS encourages the Commission to give the second objective explicit weight when it evaluates new technologies and services, including by

[8] 47 CFR § 9.28 (paragraphs (5) and (6) of the NG911 definition).

considering the reasonable expectations of 911 Authorities and telecommunicators that the *Notice* raises (Section V.D below).

V. SCOPE CRITERIA

The *Notice* asks whether and how the 911 scope criteria should evolve.[9]

A. Information Accompanying Non-Voice and Automated Inputs

1. Inputs Without a Person Behind Them

The *Notice* asks, "Is it relevant whether a consumer actively initiates the communication with emergency services?" (¶16). In IJIS's view, its main relevance is to the information available to the ECC when it acts. On a 911 call, the telecommunicator can ask the caller for details. An automated input has no one to ask, so the ECC relies on the data that arrives with it. For some inputs, a way to reach the provider can supply what the data does not.

For the Commission's consideration. Where automated inputs fall within its framework, the Commission could consider whether they should identify themselves as automated, as some already do, and carry the information described in Section V.A.2. These elements would help ECCs act on automated inputs and manage the false alarms the *Notice* recognizes,[10] without excluding inputs simply because no consumer initiated them.

2. Information Most Critical to Receive

The *Notice* asks what device or provider data are most critical for 911 Authorities to receive.[11] For an automated input, information that conveys what happened and where, how much weight to give it, and, where relevant, how to follow up can help the ECC act on it. The detail supporting a provider's conclusion can matter as much as the conclusion itself. An airbag deployment, for example, may indicate a crash or an attempted theft, and that detail helps the telecommunicator tell the difference.

3. Voice and Non-Voice Communications

The *Notice* asks whether "real-time voice communications [should] be regulated differently than non-voice communications, data-centric services, and other technologies" (¶28). In IJIS's experience, for automated inputs and other data-centric services, the information described above can often be more relevant than a callback number, while location and routing remain essential. The same holds for inputs that travel entirely over IP networks and carry no telephone number, which bears on the *Notice*'s question about PSTN interconnection.[12]

---

[9] *Notice* ¶¶13–25.
[10] *Id.* ¶9 & n.33.
[11] *Id.* ¶16.
[12] *Id.* ¶17.

For the Commission's consideration. If the Commission pursues a baseline set of functional 911 capabilities, as ¶28 suggests, it could consider parallel elements for automated inputs and data-centric services that fill the role a callback number plays for voice calls and texts, so the baseline accounts for each type of input.

4. Location Remains Central

Inputs are ultimately tied to a location: either one they carry themselves, such as a crash alert or sensor reading, or the location of the incident they support, such as drone video or a responder update on an incident already in CAD.

For the Commission's consideration. As the Commission considers harmonizing the type and accuracy of location information,[13] location conveyed in a standard form, whether as dispatchable location or as coordinates, allows ECC systems to match it against authoritative GIS data and use the same reference across them.

B. Artificial Intelligence and Integrity at Intake

1. Artificial Intelligence

AI now plays a role both before information reaches the ECC and within it. Before information arrives, AI and other algorithms in phones, wearables, vehicles, and sensors increasingly classify events, for example determining that a crash, fall, or gunshot has occurred, and can initiate a 911 call on its own, in some cases playing an automated voice message with the user's location. In the future, general-purpose AI assistants acting on a user's behalf may decide when to contact 911 and hold a two-way exchange with the telecommunicator, answering questions for a user who cannot. Within the ECC, AI supports transcription, translation, quality assurance, and, in some instances, triage of non-emergency calls.

For the Commission's consideration. Where AI-derived information reaches ECCs through services within its framework, the Commission could address its question on accounting for AI[14] by considering whether that information should indicate when it was generated or classified by AI and convey available information on the basis for its conclusion. Both support informed human judgment at the ECC.

2. Integrity at Intake

The first core objective includes security (¶11), which for data-rich 911 extends to confidence that information is genuine and unaltered. Information first recorded at the ECC becomes a foundation for the response and then for records, investigations, prosecution, and courts. Whether data is genuine, unaltered, and accompanied by its supporting detail is most reliably established when it arrives and can be difficult to reconstruct later.

---

[13] *Id.* ¶28.
[14] *Id.* ¶¶16, 22.

In practice, that confidence depends on knowing who or what generated the information, including whether AI was involved, and which parties handled it (its provenance), and on assurance that it came from a legitimate source (its authenticity). It is strengthened when any conclusion arrives with its supporting detail, and when timestamps are consistent enough to sequence events and review them later. The growth of AI-generated media and automated inputs makes each of these increasingly important for both response and justice.[15]

For the Commission's consideration. Where non-voice and automated inputs fall within its framework, the Commission could consider whether they should, where practicable, carry information on provenance and authenticity. Doing so would respond to the *Notice*'s questions on accounting for AI and on the benefits and risks to consider,[16] and would support the security element of the first core objective.

C. Integration Across All Inputs

Decisions about individual and community inputs, such as which device or provider data are most critical for 911 Authorities to receive and the type and accuracy of location information transmitted,[17] will shape how readily ECCs can combine those inputs with information from response operations.

In IJIS's experience, standards matter equally for inputs that arrive with a 911 call and for those that arrive independent of one. Both reach the same telecommunicator team and the same incident record. Some inputs that arrive independent of any call, including information from response operations, can give rise to new incidents. Even where those inputs fall outside the Commission's framework, the data and capabilities the Commission considers for inputs within it can become a reference point that agencies and solution providers apply to the rest through procurement.

Interoperability is the first element of the Commission's NG911 definition,[18] and the Commission is already addressing it among NG911 networks.[19] The inputs described in these comments raise a complementary question: whether information arrives at the ECC in a form its systems can use together, including information that reaches the center outside the 911 call path. Existing NG911 standards address parts of this, but their benefit depends on how consistently they

[15] Information that moves from the ECC into justice processes also remains subject to applicable privacy, retention, and criminal justice information security requirements.
[16] *Notice* ¶¶16, 22.
[17] *Id.* ¶¶16, 28.
[18] 47 CFR § 9.28 (paragraph (1) of the NG911 definition, "[e]nsures interoperability").
[19] The Commission requires providers of NG911 Core Services and ESInets to report on actions to enable interstate interoperability and has proposed testing transfers between networks for preservation of location and media metadata and conformance with commonly accepted standards. *See Facilitating Implementation of Next Generation 911 Services (NG911); Improving 911 Reliability*, PS Docket Nos. 21-479 and 13-75, Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 26-39 (rel. June 26, 2026) (*NG911 Reliability Order*), ¶¶3, 187.

are specified and implemented. As with any fast-moving field, approaches to delivering automated inputs have also developed provider by provider, so formats, delivery paths, and interfaces vary.

If automated inputs within the Commission's framework arrive in a structured form built on commonly accepted standards, with a common set of data elements and information that allows related inputs to be correlated, an ECC's CAD system could ingest them through standards-based interfaces rather than a separate integration for each provider. Local governance, agreements, security requirements such as those governing criminal justice information, and system configuration would still determine how each input is used. Agencies could then require the same or complementary standards when they acquire drone, video, sensor, and real-time crime center platforms, so that information from response operations can attach to the same incident record instead of appearing on a separate screen.

For the Commission's consideration. The *Notice* asks whether interoperability with other networks or platforms should inform its scope analysis (¶18) and recognizes that capabilities may become practical as "standards develop" (¶25). In answering those questions, the Commission could consider interoperability at the ECC, which does not require identical systems or vendors but means that information from automated inputs and data-centric services within its framework reaches ECC systems in a form they can ingest without the need for proprietary interfaces, as a complement to its work on interoperability among NG911 networks. Referencing commonly accepted standards for that information, as its NG911 definition already contemplates,[20] would give agencies a shared reference to cite in procurement. Paired with outcome-based guidance, such as the NG911 objectives IJIS is working with practitioners and industry to describe, that reference would support interoperability across the full range of inputs ECCs receive.

D. Expectations of 911 Authorities and Communities

The *Notice* asks, "To what extent should we also consider the reasonable expectations of 911 Authorities, 911 telecommunicators, and emergency responders?" (¶20). In IJIS's experience, those expectations are distinct from consumer expectations, because they concern what happens after the connection is made.

The distinction is clearest for community inputs. For environmental sensors, the people helped may never know an alert was sent, and for both these and school panic alarms, the purchaser is often a school district, facility operator, or municipality rather than those the system protects.

For the Commission's consideration. IJIS encourages the Commission to treat the reasonable expectations of 911 Authorities and telecommunicators as an explicit factor in its scope analysis, alongside consumer expectations. For community inputs, the Commission could also

[20] 47 CFR § 9.28 (paragraph (3) of the NG911 definition, "[e]mploys commonly accepted standards").

look to what the institutions deploying these systems and the 911 Authorities receiving their alerts reasonably expect, since they are often the parties most directly involved.

E. Feasibility

The *Notice* recognizes that an offering may depend on "devices, operating systems, network providers, cloud services, or other third parties."[21] The same layering extends to how information reaches ECCs, where data aggregators and other platforms can sit between the source and the center. Each handoff along that chain affects whether information reaches the ECC complete, timely, and with its origin intact. An assessment of feasibility and control that looks only at the originating offering may not show where in the chain a capability is gained or lost.

For the Commission's consideration. In evaluating feasibility and what lies within a provider's control, including for services used in combination,[22] the Commission could consider whether each party in the path should preserve the information and origin data it receives, note any material changes it makes as it passes them along, and identify its role in handling that information. This approach would give every participant a clear, bounded role without assigning any party responsibility for elements it does not control.

VI. CONCLUSION

IJIS appreciates the Commission's first-principles review of the 911 framework. The innovations reaching ECCs today are a significant advance for public safety, and practitioners and industry share an interest in making them work together. IJIS encourages the Commission to weigh, alongside the public's ability to reach 911, what arrives at the ECC, whether it can be trusted, and how readily it can be used with everything else the center receives. IJIS offers its convening experience and its network of practitioners and industry as a resource as the record develops.

Respectfully submitted,

THE IJIS INSTITUTE

/s/ Maria Cardiellos
Maria Cardiellos
Executive Director
20110 Ashbrook Place, Suite 150
Ashburn, VA 20147
Maria.Cardiellos@ijis.org

November 16, 2026

[21] *Notice* ¶24.
[22] *Id.* ¶¶24, 28.