Virginia Department of
Emergency Management

Commonwealth of Virginia Originating Service Provider Next Generation 9-1-1 Migration Plan

September 2026



Table of Contents

Executive Summary 1
Status of Next Generation 9-1-1 (NG9-1-1) in Virginia 2
Current Transitional Networks with Legacy and Next Generation Elements 2
How it works 3
NG9-1-1 4
Next Steps 4
Future Considerations 5
The FCC Framework and the Code of Virginia 5
FCC 5
Definitions 5
Phase 1 5
Phase 2 5
Challenges 6
Cost Demarcation 6
Mutual Agreement 6
Code of Virginia 6
Need for Mutual Agreement 7
Costs 7
Points of Interconnection (POIs) and NG9-1-1 Delivery Points 7
Timelines 7
A Path Forward 7
9-1-1 Services Board 7
Guiding Principles 7
Powers & Duties 8
POIs and NG9-1-1 Delivery Points 8
NG9-1-1 Commonly Accepted Standards 8
OSP Cost Recovery 9
9-1-1 Services Board as Virginia 9-1-1 Authority for FCC Phase 1 & Phase 2 10
Virginia Civilian Primary PSAPs 10
Next Generation ESInet and Core Services Providers 11

Originating Service Providers 11
Next Steps 13
Major Milestones 13
Gantt Chart 13
Board Approval of Plan 13
Onboarding and Decisions 13
Communication 14
Budget 14
Conclusion 15
Appendix A: 15
Virginia NG9-1-1 Originating Service Provider (OSP) Cost Recovery Guidelines 16
Purpose 16
Code of Virginia 16
Eligible Costs 16
Implementation 16
Reimbursement 17
Audits 17
Errors 17
Appendix B: 18
Virginia OSP NG9-1-1 Migration Plan Project Statuses and Dependencies 18
Appendix C: 22
Virginia PSAP 9-1-1 Authority Options for FCC Phase 1 and Phase 2 22
Appendix D: 23
Virginia OSP Information Form 23

Executive Summary

The Commonwealth has discussed, planned, and implemented parts of Next Generation 9-1-1 (NG9-1-1) for the last fifteen years. Over this time, the technology and functionality of NG9-1-1 systems have changed as deployments across the country by multiple states and localities, multiple emergency service internet protocol (IP) networks (ESInet) providers, and multiple Next Generation Core Service (NGCS) providers turned theory into reality.

All Virginia civilian primary 9-1-1 centers, or public safety answering points (PSAPs), completed their migrations to NG9-1-1 between June 2020 and October 2025. During the July 2025 – June 2026 fiscal year, 78% of the Virginia 9-1-1 calls on the NG9-1-1 system were geospatially routed, being delivered to the correct PSAP faster with better location information so 9-1-1 telecommunicators could dispatch emergency responders more quickly. More importantly, only 1.9% of received 9-1-1 calls were transferred, meaning that more than 98% of the 9-1-1 calls arrived at the correct PSAP first. In 2017, nearly 11% of received 9-1-1 calls were transferred.

While recognizing these successes, which mostly benefit the 80% of emergency calls from wireless devices, the journey is not done. Originating Service Providers (OSPs), the incumbent local exchange carriers (ILECS), competitive local exchange carriers (CLECs), wireless, and interconnected voice over internet protocol (VOIP) providers that receive 9-1-1 calls need to work with 9-1-1 Authorities to comply with United States Federal Communications Commission (FCC) regulatory frameworks and NG9-1-1 commonly accepted standards so that emergency calls are “next generation” from the time that the call is placed to the time it is answered. These changes will finish moving Virginia away from legacy technology to completely internet-based call delivery, remove transitional systems, improve resiliency, and ensure that any civic address location 9-1-1 telecommunicators view will be sourced from or validated against locally maintained GIS addresses.

Since initial planning, the landscape and best practices have also changed. Moving OSPs to NG9-1-1 means establishing points of interconnection (POIs) or NG9-1-1 delivery points, where they can connect with the NG9-1-1 ESInet and NGS used by Virginia PSAPs. Portions of Virginia’s 2018 NG9-1-1 implementation plan relating to OSPs have not been put into action. Elements of the Code of Virginia adopted in 2017 overestimate the number of POIs needed to accomplish project goals. Many CLECS and VOIP providers already connect to the ESInet outside of Virginia. FCC actions in the 2001 and 2002 King County decision and further action in the 2024 report and order FCC-24-78A1 for Facilitating the Implementation of NG9-1-1 services create cost demarcation industry standards. The current Code of Virginia creates local exceptions to these standards.

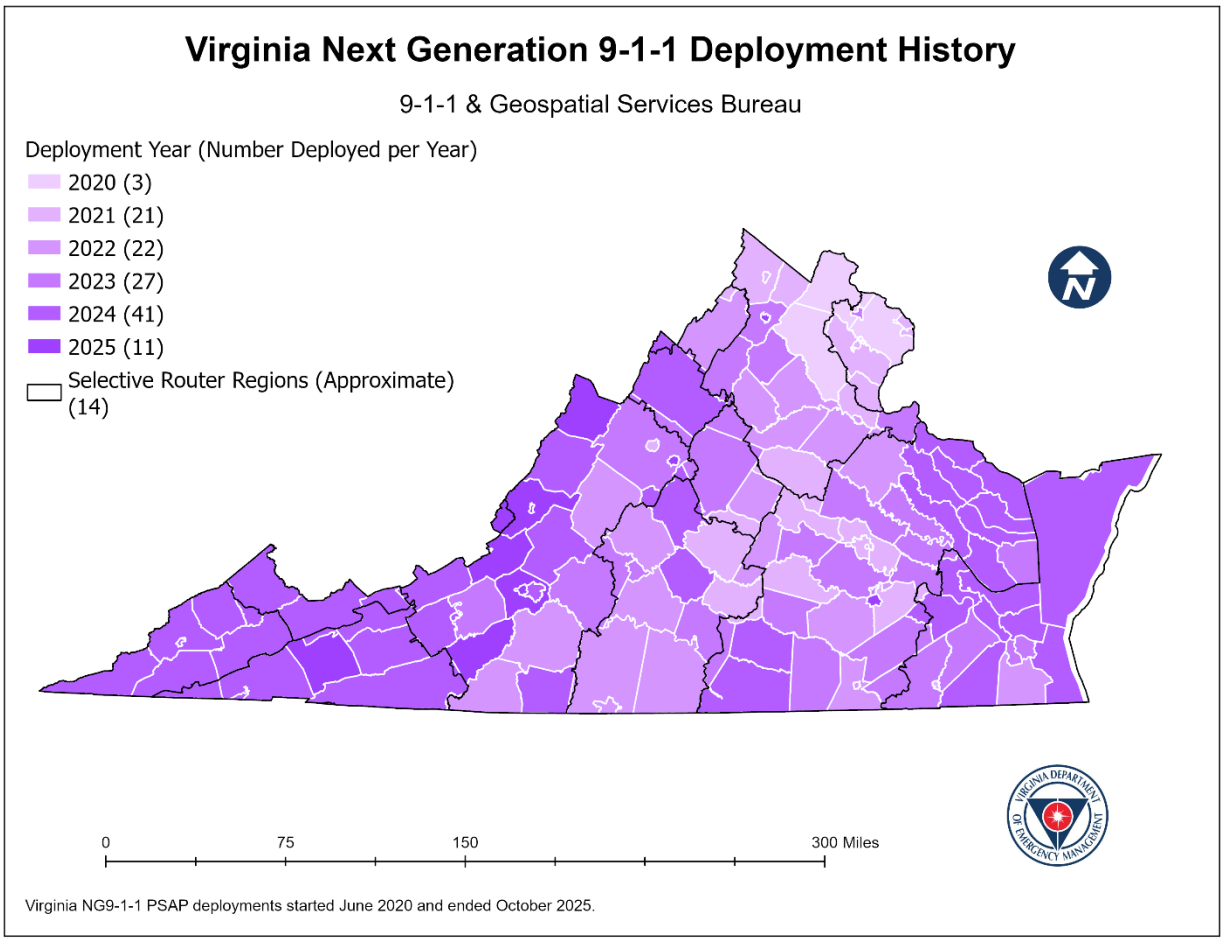
The purpose of the Virginia OSP NG9-1-1 Migration Plan is to update and outline how the Virginia 9-1-1 Services Board, PSAPs, OSPs, ESInet providers, and NGCS providers can move forward in facilitating the implementation of NG9-1-1 in Virginia from call origination to call

delivery while working within the FCC framework and following provisions in the Code of Virginia. All are partners in achieving the vision of NG9-1-1 in Virginia.

Status of Next Generation 9-1-1 (NG9-1-1) in Virginia

Current Transitional Networks with Legacy and Next Generation Elements

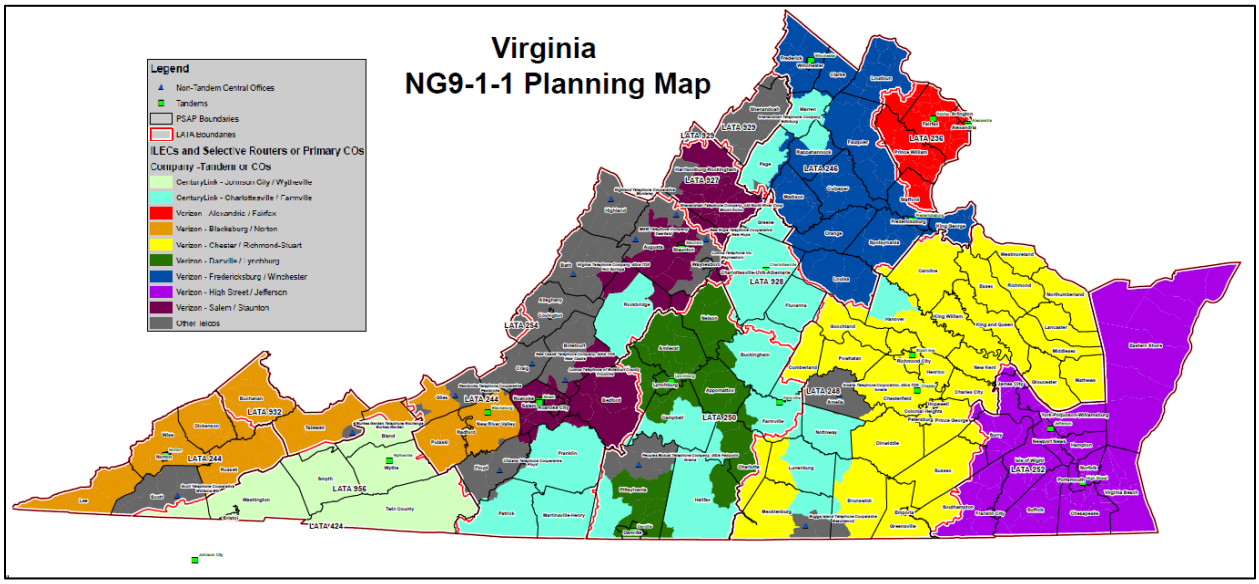
All civilian primary PSAPs – those that directly receive 9-1-1 calls – in Virginia are connected to an ESInet, are ready to receive calls in the modern IP format, and are supported by locally maintained and regularly updated GIS data so the systems have what they need to function properly.



Currently all civilian primary PSAPs in Virginia use AT&T for ESInet and NGCS.

While PSAPs are ready, the systems delivering emergency calls in the Commonwealth is dependent on combinations of decades old technology and cutting-edge internet-based networks. Call origination is often tethered to voice-centric communications using analog networks that are quickly going out of service and place limitations on the reliable delivery of 9-1-1 service.

Some OSPs have worked with the ESInet and NGCS provider selected by Virginia PSAPs to provide calls digitally with session internet protocol (SIP) technology. AT&T considers this "AT&T Phase 2." Others are still using selective routers and trunking to deliver 9-1-1 calls to AT&T or using selective network gateways at the POI. Work remains to be done to transition all of these connections to direct NG9-1-1 connections, send calls as NG9-1-1 SIP calls, and include NG9-1-1 data in NG9-1-1 standard format for the ILECs shown in the map below and all OSPs operating in Virginia.



Virginia OSPs by Type	Providers Active in Virginia in 2026 Based on FCC Filings
ILEC	17
CLEC	94
Interconnected VOIP	940

How it works

The current 9-1-1 network is accessed through an OSP. The OSP may provide their service to the consumer through the public switched telephone network (landline telephone service), a mobile switching center (cellular or wireless telephone service) or the Internet (VOIP). Regardless of the access technology, the OSP recognizes when the consumer dials the digits 9-1-1 and routes the call to the legacy 9-1-1 service provider's selective router, tandem switch, or directly to NG9-1-1. The legacy 9-1-1 service provider has historically been the local exchange carrier (telephone company) that provides service to the area of the local 9-1-1 center. After the OSP passes a security check to enter the ESInet, it delivers the call and all available data to the ESInet at a POI. The POI connection is either through a legacy network gateway (LNG) that turns the analog information to digital, or directly as digital information at a POI.

The OSP also sends the location of the caller with the call. If the call is wireless, this is sent as geodetic location in terms of latitude, longitude, and altitude. If the call is wireline or VOIP, this is sent as civic location information in the form of a street address. In the current environment in Virginia, civic locations are validated against an MSAG through Intrado's 9-1-1 Net solution. This is provided as part of the AT&T NG9-1-1 PSAP deployment solution. MSAGs migrated from ILECs to AT&T as Virginia PSAPs went live with NG9-1-1.

The ESInet then utilizes NGCS to determine which PSAP receives the call, adds additional location information, and routes the call and data to that PSAP. The call handling equipment (CHE) receives the call and the data, and it is presented to the call taker on their computer screen.

NGCS also translates civic locations to geodetic locations and geodetic locations to civic locations so that both geodetic locations and civic locations are sent with every call. The call handling equipment (CHE) receives and displays the call, originating number, and location.

NG9-1-1

The FCC defines Next Generation 9-1-1 in 47 CFR § 9.28 as "an Internet Protocol-based system that –

(1) Ensures interoperability;
(2) Is secure;
(3) Employs commonly accepted standards;
(4) Enables emergency communications centers to receive, process, and analyze all types of 911 requests for emergency assistance;
(5) Acquires and integrates additional information useful to handling 911 requests for emergency assistance; and
(6) Supports sharing information related to 911 requests for emergency assistance among emergency communications centers and emergency response providers."

NG9-1-1 is based on a modern, internet protocol (IP) network, that has the ability to deliver calls to the appropriate 9-1-1 center faster; transfer 9-1-1 calls and associated data anywhere needed; interconnect with other public safety systems and databases; and to securely receive multimedia communications like text, photos and videos.

Next Steps

The Commonwealth must continue moving forward now to evolve 9-1-1 and ensure quality service to its citizens and visitors. As service providers begin abandoning the 45-year old, circuit-switched networks, the urgency to update originating 9-1-1 infrastructure to NG9-1-1 will increase tremendously. This transition better enables the public to use IP-based services (including text, email, VoIP, video conferencing, social media, etc.) to natively communicate with 9-1-1. Direct access to 9-1-1 for hearing and speech impaired citizens is a critical service and requirement upon all PSAPs. Actions to continue transforming the 9-1-1 system into a fully

digital network that is faster, more efficient, and has greater capabilities to serve Virginia's citizens and visitors must begin now.

Future Considerations

Currently civilian primary PSAPs in Virginia connect to one ESInet and NGCS provider. In the future there may be more than one ESInet and NGCS provider within Virginia. Future possibilities should not delay the work that needs to be done now with current providers. If additional ESInet and NGCS providers serve Virginia in the future, the Virginia 9-1-1 Services Board may specify additional POIs.

The FCC Framework and the Code of Virginia

FCC

In June 2024, the FCC adopted report and order FCC-24-78A1 modifying Federal Title 47 Part 9 9-1-1 requirements by creating a framework to guide 9-1-1 authorities and OSPs so both achieve NG9-1-1.

Definitions

The action in 47 CFR § 9.28 has the following definitions:

"911 Authority" is "a State, territorial, regional, Tribal, or local governmental entity that operates or has administrative authority over all or any aspect of a communications network for the receipt of 911 traffic at NG911 Delivery Points and for the transmission of such traffic from that point to PSAPs."

"Originating Service Providers" are "providers that originate 911 traffic, specifically wireline providers; commercial mobile radio service (CMRS) providers, excluding mobile satellite service (MSS) operators to the same extent as set forth in § 9.10(a); covered text providers, as defined in § 9.10(q)(1); interconnected Voice over Internet Protocol (VoIP) providers, including all entities subject to subpart D of this part; and internet-based Telecommunications Relay Service (TRS) providers that are directly involved with routing 911 traffic, pursuant to subpart E of this part.

Phase 1

When Virginia PSAPs are connected to an ESInet and NG9-1-1 delivery points are designated, a 9-1-1 Authority makes a formal Phase 1 request by written notice or the FCC registry in Docket 25-143. OSPs then have 6 months if a nationwide CMRS, VOIP, or text provider or 12 months if an RLEC, non-nationwide CMRS, or internet-based TRS provider to deliver their 9-1-1 traffic to the designated NG9-1-1 delivery points in SIP format.

Phase 2

After Virginia PSAPs are connected to an ESInet and NG9-1-1 delivery points with FCC Phase 1, they need to certify they are ready for FCC Phase 2. For Phase 2, PSAPs need to be able to receive SIP calls, be supported by NENA-compliant GIS datasets, and have fully functioning NGCS including the ECRF and LVF. A 9-1-1 Authority then makes a formal Phase 2 request by

written notice or the FCC registry in Docket 25-143. OSPs then have 6 months if a nationwide CMRS, VOIP, or text provider or 12 months if an RLEC, non-nationwide CMRS, or internet-based TRS provider to deliver their 9-1-1 traffic to the designated NG9-1-1 delivery points in SIP format with other "NG911 commonly accepted standards." All traffic must also use the standard PIDF-LO format for transmitting location information with emergency calls. This also requires OSPs to utilize the NGCS Location Validation Function (LVF) to verify customer locations against locally provided GIS data to populate a Location Information Server (LIS). Validated customer locations are then delivered with emergency calls.

Challenges

OSPs may enter challenge petitions for FCC Phase 1 and Phase 2 requests believed to be invalid in the FCC registry in Docket 25-144.

Cost Demarcation

Following the precedents of the King County decision, the 2024 report and order divides cost at the POI. "Originating service providers are responsible for the costs of complying with the applicable Phase 1 and Phase 2 requirements assigned to them"(47 CFR § 9.33). 9-1-1 Authorities are responsible for their ESInet and NGCS services.

Mutual Agreement

The FCC framework recognizes that 9-1-1 services are provided and governed differently across the country. As such, the framework is not a strict recipe but a structure that enables 9-1-1 authorities to work with the OSPs in their areas and with their ESInet and NGCS providers to implement this aspect of NG9-1-1. Specifically: nothing in the Commission's NG911 transition rules "shall prevent 911 Authorities and originating service providers from establishing, by mutual consent, terms different from the requirements" (47 CFR § 9.34). OSPs must report such agreements with 9-1-1 Authorities to the FCC within 30 days of the date. Mutual agreements are filed with the FCC by registry in Docket 25-145.

Code of Virginia

The Enhanced Public Safety Telephone Act of the Code of Virginia § 56-484 Article 7 discusses the powers and duties of the 9-1-1 Services board, related definitions, and funding. In Virginia, the local PSAP is the 9-1-1 Authority. The 9-1-1 Services Board also has 9-1-1 Authority in its powers and duties. The FCC OSP definitions coincide with those in the Code of Virginia. Code also aligns with the FCC in terms of OSP delivery of 9-1-1 calls to POI designated by the 9-1-1 Services Board and develop plans to migrate to NG9-1-1.

Code of Virginia differs from the FCC framework in terms of cost demarcation. While "the originating service provider responsibility for 9-1-1 calls ends and the PSAP responsibility begins at their respective sides of the ESInet point of interconnection" by Federal regulation, "the NG9-1-1 service provider shall not charge the originating service provider to connect to the ESInet point of interconnection nor for the delivery of the 9-1-1 calls to the PSAP" (§ 56-484.16 E). Virginia Code § 56-484.17 D provides a mechanism for this in that "if requested by an

originating service provider, the Board shall execute a contract to reimburse that originating service provider for its costs incurred to deliver 9-1-1 calls to the ESInet points of interconnection. The Board shall ensure that cost is minimized while still achieving necessary 9-1-1 service and ESInet objectives."

Need for Mutual Agreement

At this time, there are three areas where a Virginia 9-1-1 Authority and an OSP may need mutual agreement and reporting.

Costs

If originating service providers request a contract and reimbursement with the 9-1-1 Services Board under the Code of Virginia, an agreement and reporting is needed.

Points of Interconnection (POIs) and NG9-1-1 Delivery Points

Code of Virginia discusses POIs in context of the Commonwealth. The FCC notes that "each NG911 Delivery Point is located in the same state or territory as the PSAPs connected to the ESInet" 47 CFR § 9.32. Many national OSPs connect to networks at multiple places across the country, which may or may not be within a particular state or territory. More than 14 other states designate POIs in state and allow for consideration of out of state POIs approved by the NG9-1-1 ESInet provider. This approach is recommended to work together to minimize cost will achieving necessary ESInet objectives. An agreement and reporting is needed.

Timelines

If originating service providers request a different timeline or extension, an agreement and reporting is needed.

A Path Forward

The Virginia 9-1-1 Services Board, Virginia civilian primary PSAPs, OSPs, ESInet providers, and NGCS providers all have roles to play in continuing NG9-1-1 in Virginia so that a call is NG9-1-1 from the time it is placed to the time that it is answered. This section outlines steps and dependencies in the effort to have all OSPs providing 9-1-1 service in Virginia achieve "FCC NG9-1-1 Phase 2" compliance in an orderly and timely fashion while accommodating the Code of Virginia and challenges encountered by OSPs, particularly the rural ILECs in Virginia.

9-1-1 Services Board

Guiding Principles

The 9-1-1 Services Board reaffirms the six principles adopted in 2018 that continue to guide planning and implementation of NG9-1-1 in Virginia. These guiding principles are essential for the success of NG9-1-1:

- 9-1-1 is an essential, local/regional, public safety service
- Need to address ALL of 9-1-1 not just NG
- Full partner engagement is needed

- Services must not be degraded
- Economies need to be leveraged
- Doing nothing is NOT an option

Powers & Duties

The 9-1-1 Services Board has 9-1-1 Authority in its powers and duties (§ 56-484 Article 7), particularly in:

- "Support and assist PSAPs in the provision of 9-1-1 operations and services."
- "Plan, promote, and assist in the statewide development, deployment, and maintenance of an emergency services IP network that will support future 9-1-1 and other public safety applications and technologies."
- "Make and enter into all contracts and agreements necessary or incidental to the performance of its duties and the execution of its powers."
- "Grant such extensions of time for compliance with the provisions of § 56-484.16 as the Board deems appropriate."
- "Perform all acts necessary, convenient, or desirable to carrying out the purposes of this article."
- "Establish ESInet points of interconnection in a manner that minimizes cost to the originating service providers to the extent practicable while still achieving necessary 9-1-1 service and ESInet objectives."

POIs and NG9-1-1 Delivery Points

With the approval of this plan, the Virginia 9-1-1 Services Board designates POI for Virginia NG9-1-1 delivery as:

- AT&T connection at Equinix in Ashburn, VA, 20147
- AT&T connection at QTS in Sandston, VA, 23150
- Out of state POIs proposed by OSPs and approved by the NG9-1-1 ESInet provider

OSPs serving Virgina must connect to NG9-1-1 ESInet providers with at least one port at two different POIs.

AT&T will bill Virginia for the construction of the 2 in-state POIs at the one-time cost of $139,000 each for a total of $278,000.

NG9-1-1 Commonly Accepted Standards

With the approval of this plan, the Virginia 9-1-1 Services board designates the NENA i3 standard, applicable related standards, and future versions of i3 standards as the commonly accepted standard in Virginia including but not limited to:

- Having location information embedded in the call signaling using Presence Information Data Format—Location Object (PIDF-LO)
- Establishment and maintenance of a LIS
- Use of the LVF to validate LIS records.

OSP Cost Recovery

With the approval of this plan, the Virginia 9-1-1 Services Board replaces the Virginia NG9-1-1 Originating Service Provider (OSP) Cost Recovery Guidelines approved June 2024 with the new guidelines in Appendix A. Virginia can pay Virginia costs when requested and an agreement is reached but will not assume costs for calls for other states or territories. The updated guidelines include specifying the following covered costs incurred in delivering 9-1-1 calls to POIs and reimbursement requirements.

Not all OSPs may seek cost recovery from the Virginia 9-1-1 services board since the FCC considers these costs OSP responsibilities. Many national providers are already connecting to ESInet POIs across the country. Non-recurring costs for construction and establishing connectivity are unknown until projects advance.

Below are estimates are provided for awareness and planning. Actual costs will not be known until OSPs contact Virginia to discuss migration and cost recovery options.

Number of OSPs Requesting Cost Recovery	Non-Recurring Establishment of Connectivity	Non-Recurring SIP Implementation at POI (per OSP for 2 POI)	Total Non-Recurring Costs
20	TBD	$40,000	TBD
100	TBD	$200,000	TBD
500	TBD	$996,000	TBD
1,000	TBD	$2,000,000	TBD

Number of OSPs Requesting Cost Recovery for ongoing Connectivity for Call Delivery	Monthly Recurring Connectivity	Annual Recurring Connectivity
20	TBD	TBD
100	TBD	TBD
500	TBD	TBD
1,000	TBD	TBD

Number of OSPs Requesting Cost Recovery at POIs	Monthly Recurring ESInet Port Access (1 per OSP per POI)	Monthly Recurring Concurrent Call Sessions (calculated at 75 CCS)	Annual Recurring ESInet Port Access (1 per OSP per POI)	Annual Recurring Concurrent Call Sessions (estimated, depends on the number of VA CCS per OSP)	Total Annual Recurring Costs at POIs
20	$16,500	$21,165	$194,500	$254,000	$448,500
100	$82,000	$106,000	$985,000	$1,270,000	$2,255,000
500	$410,000	$530,000	$5,000,000	$6,350,000	$11,350,000
1,000	$820,000	$1,100,100	$9,900,000	$12,700,000	$22,600,000

9-1-1 Services Board as Virginia 9-1-1 Authority for FCC Phase 1 & Phase 2

Given that Virginia has 120 civilian primary PSAPs and that there are more than 1,000 OSPs in Virginia, coordination will make the OSP phase of NG9-1-1 migration efficient and manageable. While local PSAPs are also 9-1-1 Authorities for the purposes of FCC Phase 1 and Phase 2, the 9-1-1 Services Board has the responsibility of working with OSPs, particularly in terms of requests for funding. The Board asks Virginia civilian primary PSAPs to either "opt in" or "opt out" of having the 9-1-1 Services Board act as the 9-1-1 Authority on their behalf for the purposes of complying with FCC Phase 1 and Phase 2 by 30 November 2026. PSAPs not opting in are responsible for coordinating with their ESInet and NGCS providers, the 9-1-1 Services Board, and completing the framework. The more PSAPs that opt in, the more unified and less duplicative efforts and coordination with ESInet, NGCS, and OS providers will be.

The Virginia 9-1-1 Services Board, and 9-1-1 Geospatial Services Bureau, Virginia Department of Emergency Management, staff supporting them will work with the ESInet and NGCS providers to coordinate letters of authorization (LOAs), certifications, FCC filings, OSP coordination, and agreements.

Virginia Civilian Primary PSAPs

Virginia PSAPs have completed their work in deploying with NG9-1-1. This included selecting an ESInet and NGCS provider, establishing connectivity, upgrading call handling equipment, preparing, and onboarding GIS data, testing, and going live. There is little for PSAPs to do at this stage other than to be informed of OSP migrations, respond to requests for information from the Virginia 9-1-1 Services Board, NGS staff, and the ESInet and NGCS provider, decide how to make the FCC Phase 1 and Phase 2 requests, and notify partners of problems.

The Board asks Virginia civilian primary PSAPs to either "opt in" or "opt out" of having the 9-1-1 Services Board act as the 9-1-1 Authority on their behalf for the purposes of complying with FCC Phase 1 and Phase 2. PSAP leads should complete the Virginia PSAP 9-1-1 Authority Options for

FCC Phase 1 and Phase 2 form by 30 November 2026. PSAPs opting out are responsible for coordinating with their ESInet and NGCS providers, the 9-1-1 Services Board, and completing the framework. PSAPs should follow local processes for making this decision such as legal review, internal administrative approval, and/or approval by council or board.

The Virginia 9-1-1 Services Board and staff working on their behalf will monitor projects, responses, and deadlines so that PSAPs regardless of option status are aware of status, action items, and next steps.

Next Generation ESInet and Core Services Providers

As the ESInet and NGCS provider selected by all Virginia civilian primary PSAPs, AT&T is an important part of this plan. Future ESInet and/or NGCS providers will have a similarly important part.

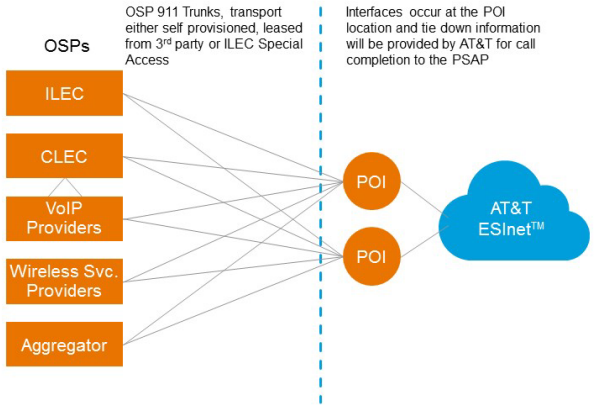
For the purposes of OSP NG9-1-1 Migration, coordination includes:

- Working with the Virginia 9-1-1 Services Board and opted-out PSAPs for FCC Phase 1 and Phase 2 requests.
- Certify PSAP readiness for FCC Phase 1 and Phase 2 requests.
- Establishing Letters of Authority between PSAPs and the ESInet
- Work with OSPs providing 9-1-1 service in Virginia to connect to designated POIs
- Coordinate with Virginia 9-1-1 Services Board when POIs are out of state
- Arrange testing for each phase
- Certify confirm results for each phase
- Regularly report status to Virginia 9-1-1 Services Board

Any future ESInet or NCGS provider selected by Virginia civilian primary PSAPs will have to work with the Virginia 9-1-1 Services Board and local 9-1-1 Authorities to accomplish the same steps.

Originating Service Providers

Each originating service provider (OSP) will need to move their 9-1-1 traffic from the selective router to an NG9-1-1 point of interconnection (POI) in FCC Phase 1 and comply with the NENA i3 Standard as the commonly accepted standard in Virginia.



Upon receiving an FCC Phase 1 or Phase 2 request, OSPs may petition to challenge the request.

As the process moves forward, the Virginia 9-1-1 Services Board will need to work with every OSP, especially if mutual agreement is necessary. To start this process, OSPs are asked to

complete the Virginia OSP Information Form collecting contact information and intent regarding:

- POIs serving as NG9-1-1 Delivery Points
- Intent on requesting cost recovery for:
    - Non-recurring costs to establish connectivity to two designated POIs, either directly or through an aggregator.
    - Recurring connectivity to deliver calls to one port at two different designated POIs on their own or through an aggregator to POI.
    - Recurring connection fees, either directly or through an aggregator, for one port at two different designated POIs where the Virginia share of the cost is isolated from calls for other states or territories.
- Use of aggregators
- Number of Virginia telephone numbers
- Plans to meet LIS requirement
- Ability to meet FCC Framework timelines

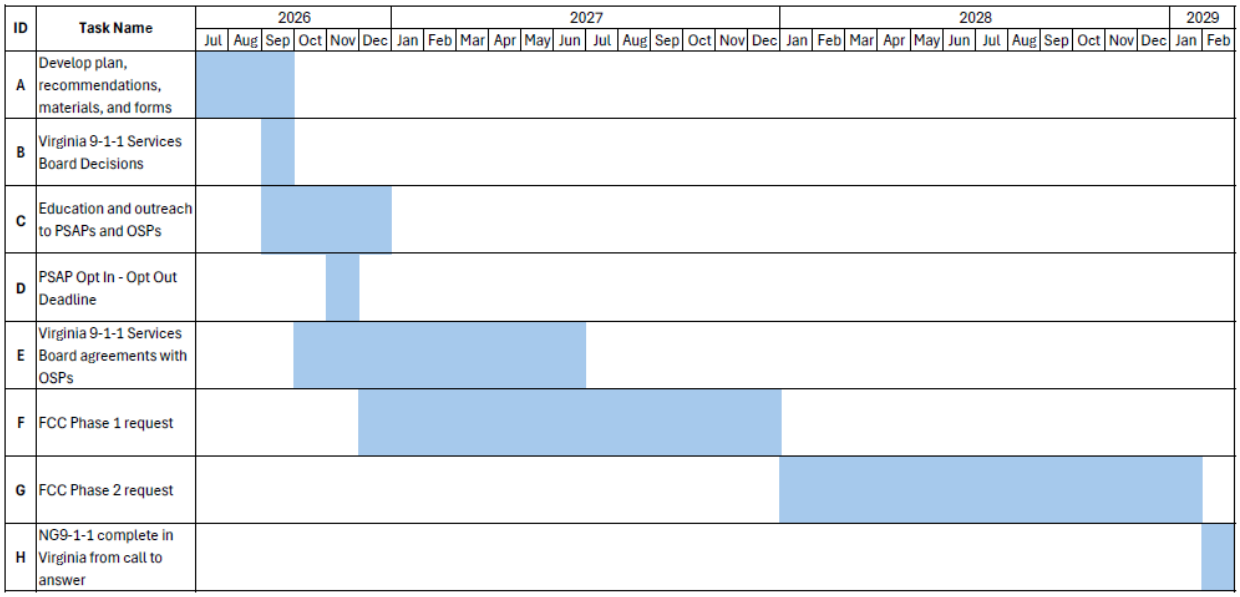
Since each OSP has a different architecture and stage in the NG9-1-1 transition, each OSP will be reviewed by VDEM independently. VDEM will negotiate mutual agreements and contracts in good faith, but will strive to reduce cost while achieving necessary 9-1-1 service NG9-1-1 objectives and complying with the Virginia OSP NG9-1-1 Migration Plan, the Virginia NG9-1-1 Originating Service Provider (OSP) Cost Recovery Guidelines, the NENA i3 Standard, and industry best practices. The reliability, security and integrity of the 9-1-1 service must be maintained while ensuring that costs are reasonable and necessary to those ends.

OSPs are expected to work with current and future ESInet and NGCS providers selected by Virginia PSAPs.

Next Steps

Major Milestones

Gantt Chart



Please see Appendix B, Virginia OSP NG9-1-1 Migration Plan Project Statuses and Dependencies, for details by staff, the Virginia 9-1-1 Services Board, PSAPs and 9-1-1 Authorities, OSPs, and ESInet and NGCS providers.

Board Approval of Plan

With the presentation of this plan at their September 2026 meeting, the 9-1-1 Services Board will need to determine if they concur with this approach including:

- 9-1-1 Authority Opt-In and Opt-Out process and timeline for the purposes of FCC Phase 1 and Phase 2 by Virginia civilian primary PSAPs.
- Designate POIs for Virginia 9-1-1 Delivery
- Designate the NENA i3 standard as the commonly accepted standard in Virginia
- Replace the Virginia NG9-1-1 Originating Service Provider (OSP) Cost Recovery Guidelines

If so, they will approve the plan. If approval is delayed, all timelines shift.

Onboarding and Decisions

During the last part of 2026, VDEM will reach out to Virginia PSAPs and ILECs in Virginia to arrange onboarding meetings. These meetings will vary by region and composition, but share the goals of explaining:

- The Virginia OSP NG9-1-1 Migration Plan
- Decision points for PSAPs and OSPs

- Dependencies between the Virginia 9-1-1 Services Board, PSAPs, OSPs, ESInet providers, and NGCS providers
- Information and decision collection
- Timelines

All Virginia OSPs will be encouraged to work with Virginia through the **Virginia OSP Information Form** to identify points of mutual agreement. While many OSPs are similar, each OSP may have unique situations or decision points that will need to be addressed. While Virginia may not be able to notify and meet with every OSP before the FCC Phase 1 request, the goal is to raise awareness with ILECs, then CLECs, then VOIP providers so that there is understanding of Virginia's plan before the FCC Phase 1 request is filed.

Communication

Communication needs to flow in every direction among partners during this process. The Virginia 9-1-1 Dashboards will show information such as:

- PSAP Status
- OSP Status Summary
- OSP Costs
- Overall Project Status

All partners need to commit to full engagement meaning that anyone with questions needs to ask them, and keep asking them, until they are answered. Especially as this effort first starts out, no one will have all the answers, however, with open communication, we will work through them together.

Budget

The budget for Virginia 9-1-1 Services Board agreements with OSPs allowed for in the Code of Virginia is uncertain until planning conversations commence. As Virginia and OSPs reach agreement, they will be brought to the Virginia 9-1-1 Services Board for approval. Staff will update and report budget projections as agreements are complete.

Taking all of these items into account, the budget structure and known costs for OSP NG9-1-1 Migration are as follows:

Non-Recurring Costs		
Category	**Number of OSPs**	**Amount**
AT&T Construction of 2 in-state POIs	N/A	$278,000.00
Establishment of Connectivity		TBD
SIP Implementation at POI		TBD
Other Non-Recurring Costs		TBD
Total Known		$278,000.00
Annual Recurring Costs		
Category	**Number of OSPs**	**Amount**
Ongoing Connectivity for Call Delivery		TBD
ESInet Port Access at POIs		TBD
Concurrent Call Sessions at POIs		TBD
Other Recurring Costs		TBD
Total Known		TBD

Conclusion

The Virginia OSP NG9-1-1 Migration Plan updates and outlines the current strategy for how the Virginia 9-1-1 Services Board, PSAPs, OSPs, and ESInet and NGCS providers will move forward in facilitating the implementation of NG9-1-1 in Virginia from call origination to call delivery while working within the FCC framework and following provisions in the Code of Virginia.

All are partners in achieving the vision of NG9-1-1 in Virginia. The key to the success of this transition process will be cooperation, communication, and coordination. Each partner in the Virgina 9-1-1 ecosystem must work together and ensure a smooth completion of the transition to NG9-1-1.

Though future meetings will define more detail of future steps, PSAPs, OSPs and other partners should strive to stay informed and involved. A number of outreach and educational events will be scheduled over the next year for all partners. Please participate in as many as possible to be aware of decision points, timelines, and statuses.

Appendix A:

The Virginia NG9-1-1 Originating Service Provider (OSP) Cost Recovery Guidelines start on the next page.

Virginia NG9-1-1 Originating Service Provider (OSP) Cost Recovery Guidelines

September 2026

Purpose

These guidelines update the Virginia NG9-1-1 OSP Cost Recovery Guidelines approved June 2024 to align with the development and adoption of the Virginia OSP NG9-1-1 Migration plan. OSP compliance with the FCC framework established by FCC-24-78A1 and the Code of Virginia will make 9-1-1 next generation from the time a call is placed to when the call is answered. Code of Virginia allows for reimbursement of certain OSP costs for Virginia 9-1-1 calls and delivery.

Code of Virginia

§ 56-484.17 D provides that "if requested by an originating service provider, the Board shall execute a contract to reimburse that originating service provider for its costs incurred to deliver 9-1-1 calls to the ESInet points of interconnection. The Board shall ensure that cost is minimized while still achieving necessary 9-1-1 service and ESInet objectives."

Terms are defined in § 56-484.12.

Eligible Costs

The following non-recurring costs incurred in establishing connectivity to Virginia designated POIs for NG9-1-1 delivery recurring costs in delivering 9-1-1 calls to them are eligible for reimbursement:

- Non-recurring costs to establish connectivity at two Virginia-designated POIs, either directly or through an aggregator.
- Recurring connectivity to deliver calls to one port at two different designated POIs on their own or through an aggregator to POI.
- Recurring connection fees, including those for port access and concurrent call sessions, either directly or through an aggregator, for one port at two different designated POIs where the Virginia share of the cost is isolated from calls for other states or territories.

Additional OSP costs related to compliance with the FCC Phase 1 and Phase 2 process may be negotiated on a case-by-case basis to achieve necessary 9-1-1 service and objectives.

Costs may be incurred directly by the OSP, billed as services by aggregators or other service providers, or by a combination of requirements.

Implementation

As OSPs engage with Virginia to complete the Virginia OSP NG9-1-1 Migration plan, the Virginia OSP Information Form should be filled out to collect information and discuss agreements. New contracts will provide for the establishment and ongoing support of eligible Virginia NG9-1-1

OSP costs when requested. Contracts will define the types of eligible services provided by the OSP and the amount of reimbursement to be provided to the OSP for those services.

Upon agreement and contract, OSPs must submit their vendor maintenance forms and tax forms to NGS staff to be registered in Cardinal, the Commonwealth's accounting and billing system.

VDEM will create Purchase Requisitions (PRs) based on the terms of the contract and agreement. Initial PRs may be for a short term with the goal of having 12-month PRs coinciding with the Commonwealth's July – June fiscal year.

If the terms are variable rather than fixed, a true up will be conducted at the end of the year to adjust the high and lows of the reimbursement requests, settling on the difference for the next PR.

Reimbursement

After agreements are complete, OSPs must request reimbursement by letter or invoice for payment. Requests must detail their own eligible costs and include invoices where appropriate from ESInet providers or aggregators. All details regardless of origin must separate or show details for eligible costs for delivering Virginia 9-1-1 calls.

Staff will review the reimbursement request, acknowledge receipt, follow up with questions concerning the request, eligibility, and documentation, and process the payment through VDEM.

Audits

The Board shall audit funding received by all recipients to ensure that it was utilized in accordance with contract requirements. If it is determined that the funding was misused, or if the guidelines were not adhered to, the Commonwealth may take appropriate action to the extent permitted by law, including, and not limited to, requiring the return of the funds.

Errors

If staff discover reimbursements that are not consistent with Board action, staff will notify the OSP by email about the error and take corrective action.

Appendix B:

Virginia OSP NG9-1-1 Migration Plan Project Statuses and Dependencies

Step	Estimated Date	Staff Dependencies	9-1-1 Services Board Dependencies	PSAP / 9-1-1 Authority Statuses	OSP Statuses	ESInet & NGCS Dependencies
1		Preparation & Development - Develop Plan - Recommendations - Education materials - Forms - Agreements		Not yet onboarded	Not yet onboarded	
2	**Sep-26**		9-1-1 Services Board decisions: - Plan - 9-1-1 Authority - POIs - Commonly Accepted Standards - OSP Cost Recovery Guidelines	Not yet onboarded	Not yet onboarded	
3	**Sep-26**		NGCS Agreement for VA POI Construction	Not yet onboarded	Not yet onboarded	9-1-1 Services Board Agreement for VA POI Construction

Step	Estimated Date	Staff Dependencies	9-1-1 Services Board Dependencies	PSAP / 9-1-1 Authority Statuses	OSP Statuses	ESInet & NGCS Dependencies
4	**Sep-26**	Prepare & Facilitate Onboarding - What - Why - VA Approach - Resources - Status and Options - Budget scenarios		Onboarding meetings scheduled	Onboarding meetings scheduled	
5	**Oct-26**	Facilitate Onboarding		Onboarded	Onboarded	
6	**Nov-26**		Agreements with OSPs	Onboarded	Virginia OSP Information Form Complete	
7	**Dec-26**		Agreements with OSPs	Onboarded	Agreements filed	
8	**Dec-26**		Monitor status as 9-1-1 Authority or 9-1-1 Services Board	9-1-1 Authority: 9-1-1 Services Board or Self		
9	**After Opt-In or Opt-Out**	Coordinate LOAs		LOA Complete		LOA Complete
10	**By Dec 2026**			Certified Phase 1 Ready		Certifies Phase 1 Readiness
11	**Dec-26**			Phase 1 Requested	Phase 1 Work	Phase 1 Work
12	**After Dec 2026**				Phase 1 Testing with NGCS	Phase 1 Testing with OSP

Step	Estimated Date	Staff Dependencies	9-1-1 Services Board Dependencies	PSAP / 9-1-1 Authority Statuses	OSP Statuses	ESInet & NGCS Dependencies
13	**After Dec 2026**			Phase 1 Extension	Phase 1 Extension	
14	**Initially July 2027**			Phase 1 initial 6 month complete	Phase 1 initial 6 month complete	
15	**Initially Dec 2027**			Phase 1 initial all complete	Phase 1 initial all complete	
16	**Initially Dec 2027**			Phase 1 confirmed complete	Phase 1 confirmed complete	Phase 1 confirmed complete
17	**By Dec 2027**			Certified Phase 2 Ready		Certifies Phase 2 Readiness
18	**About Jan 2028, depending on extensions and timelines**			Phase 2 Requested	Phase 2 Work	Phase 2 Work
19	**After Jan 2028**				Phase 2 Testing with NGCS	Phase 2 Testing with OSP
20	**After Jan 2028**			Phase 2 Extension	Phase 2 Extension	
21	**About August 2028**			Phase 2 initial 6 month complete	Phase 2 initial 6 month complete	

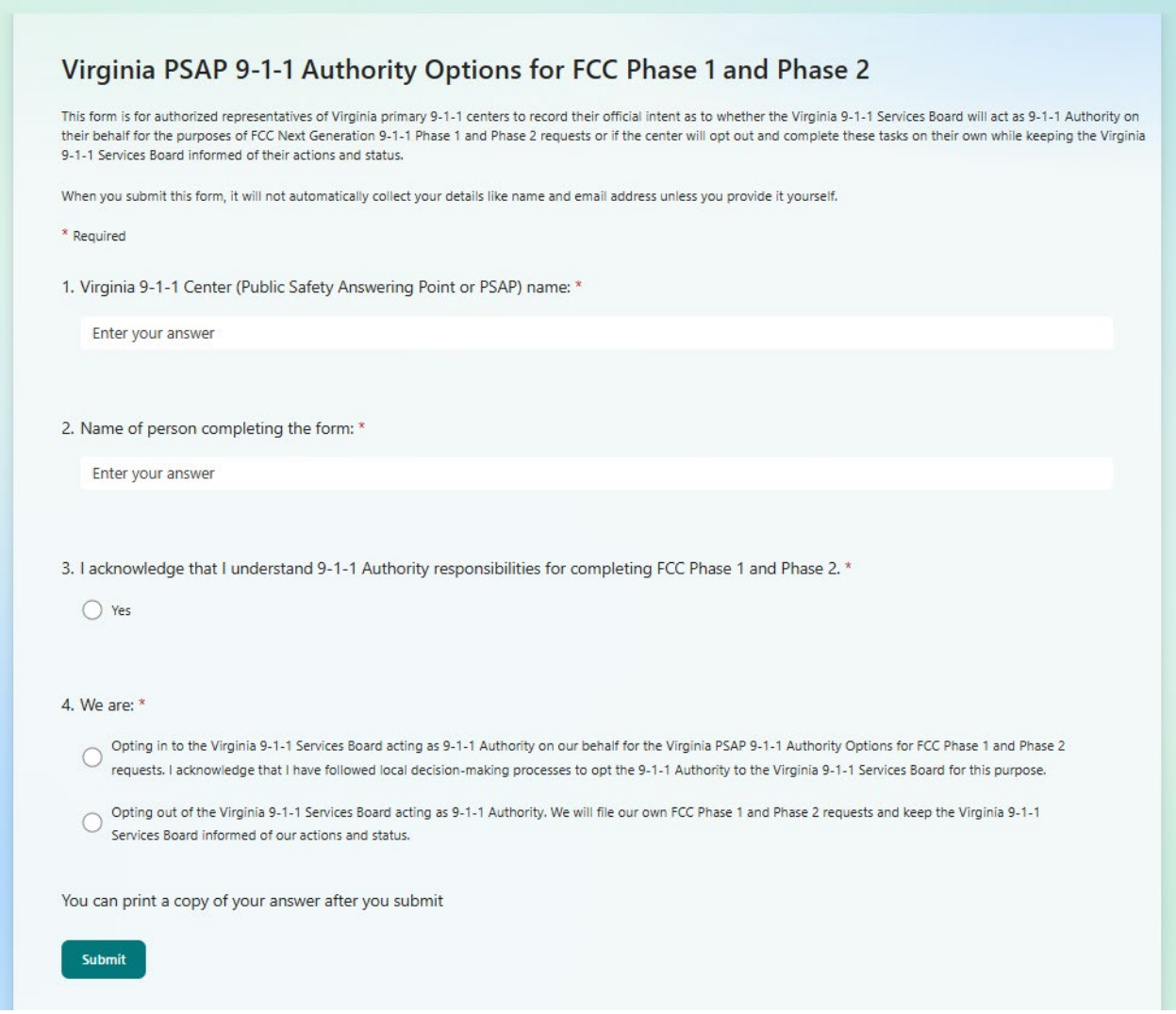
Step	Estimated Date	Staff Dependencies	9-1-1 Services Board Dependencies	PSAP / 9-1-1 Authority Statuses	OSP Statuses	ESInet & NGCS Dependencies
22	**About Jan 2029, depending on extensions and timelines**			Phase 2 initial all complete	Phase 2 initial all complete	
23	**By February 2029**			Phase 2 confirmed complete	Phase 2 confirmed complete	Phase 2 confirmed complete

Appendix C:

Virginia PSAP 9-1-1 Authority Options for FCC Phase 1 and Phase 2

The form is available at: https://forms.cloud.microsoft/g/326RU45wC7

The form asks the following questions:



Virginia PSAP 9-1-1 Authority Options for FCC Phase 1 and Phase 2

This form is for authorized representatives of Virginia primary 9-1-1 centers to record their official intent as to whether the Virginia 9-1-1 Services Board will act as 9-1-1 Authority on their behalf for the purposes of FCC Next Generation 9-1-1 Phase 1 and Phase 2 requests or if the center will opt out and complete these tasks on their own while keeping the Virginia 9-1-1 Services Board informed of their actions and status.

When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.

* Required

1. Virginia 9-1-1 Center (Public Safety Answering Point or PSAP) name: *

Enter your answer

2. Name of person completing the form: *

Enter your answer

3. I acknowledge that I understand 9-1-1 Authority responsibilities for completing FCC Phase 1 and Phase 2. *

- ◯ Yes

4. We are: *

- ◯ Opting in to the Virginia 9-1-1 Services Board acting as 9-1-1 Authority on our behalf for the Virginia PSAP 9-1-1 Authority Options for FCC Phase 1 and Phase 2 requests. I acknowledge that I have followed local decision-making processes to opt the 9-1-1 Authority to the Virginia 9-1-1 Services Board for this purpose.
- ◯ Opting out of the Virginia 9-1-1 Services Board acting as 9-1-1 Authority. We will file our own FCC Phase 1 and Phase 2 requests and keep the Virginia 9-1-1 Services Board informed of our actions and status.

You can print a copy of your answer after you submit

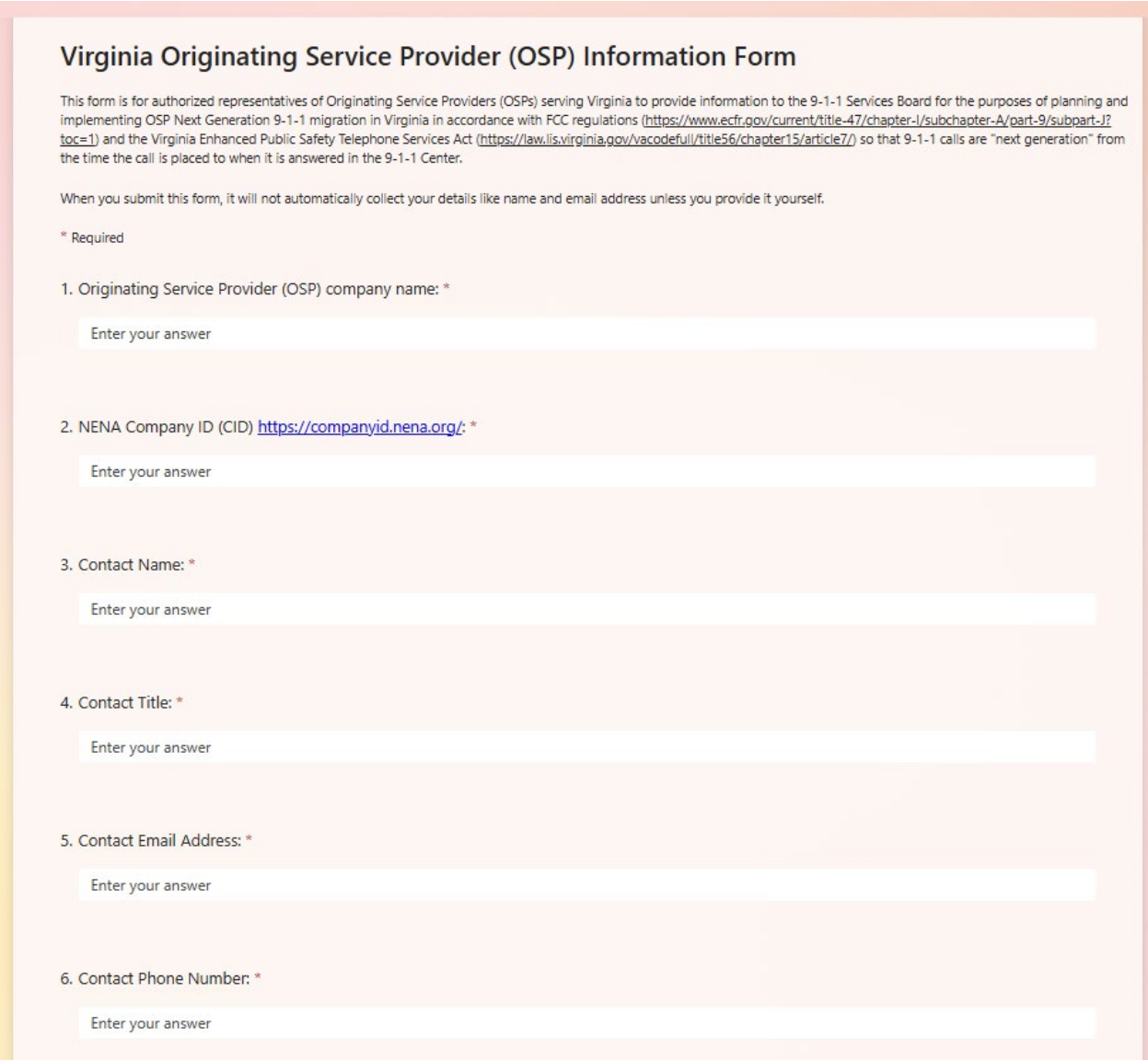
Submit

Appendix D:

Virginia OSP Information Form

The form is available at: https://forms.cloud.microsoft/g/hTqCEjBF2L

The form asks the following questions:



Virginia Originating Service Provider (OSP) Information Form

This form is for authorized representatives of Originating Service Providers (OSPs) serving Virginia to provide information to the 9-1-1 Services Board for the purposes of planning and implementing OSP Next Generation 9-1-1 migration in Virginia in accordance with FCC regulations (https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-9/subpart-J?toc=1) and the Virginia Enhanced Public Safety Telephone Services Act (https://law.lis.virginia.gov/vacodefull/title56/chapter15/article7/) so that 9-1-1 calls are "next generation" from the time the call is placed to when it is answered in the 9-1-1 Center.

When you submit this form, it will not automatically collect your details like name and email address unless you provide it yourself.

* Required

1. Originating Service Provider (OSP) company name: *

Enter your answer

2. NENA Company ID (CID) https://companyid.nena.org/: *

Enter your answer

3. Contact Name: *

Enter your answer

4. Contact Title: *

Enter your answer

5. Contact Email Address: *

Enter your answer

6. Contact Phone Number: *

Enter your answer

7. What is your intent regarding points of interconnection (POI) serving as Next Generation 9-1-1 Delivery Points? *

- ◯ We intend to connect to two POIs in Virginia
- ◯ We intend to connect to a POI in Virginia and a POI outside of Virginia
- ◯ We intend to connect to two POIs outside of Virginia
- ◯ We are currently connected to a POI outside of Virginia and intend to connect to another POI in Virginia
- ◯ We are currently connected to a POI outside of Virginia and intend to connect to another POI outside of Virginia
- ◯ We are currently connected to two or more POIs outside of Virginia

8. Do you intend to request cost recovery from the Virginia 9-1-1 Services Board allowed in § 56-484.17 (D) of the Virginia Enhanced Public Safety Telephone Services Act (https://law.lis.virginia.gov/vacodefull/title56/chapter15/article7/)? *

- ◯ Yes
- ◯ No

9. If yes to the above, select the eligible costs that you are interested in recovering:

- ☐ Non-recurring costs to establish direct connectivity at two designated POIs
- ☐ Non-recurring costs to establish connectivity at two designated POIs through an aggregator
- ☐ Recurring connectivity at two different designated POIs through direct connectivity
- ☐ Recurring connectivity at two different designated POIs through an aggregator
- ☐ Recurring connection fees at two different designated POIs through direct connectivity
- ☐ Recurring connectivity at two different designated POIs through an aggregator
- ☐ Other

10. Are you using, or do you plan to use, an aggregator for NG9-1-1 connectivity? *

- ◯ Yes, we are using an aggregator for NG9-1-1 connectivity
- ◯ Yes, we plan to use an aggregator for NG9-1-1 connectivity
- ◯ No, we are not using an aggregator for NG9-1-1 connectivity
- ◯ No, we do not plan to use an aggregator for NG9-1-1 connectivity

11. If applicable, who are you using or plan to use an aggregator for NG9-1-1 connectivity?

Enter your answer

12. Approximately how many Virginia telephone numbers do you have? *

Enter your answer

13. If you are a wireline or interconnected VOIP provider, how do you intend to operate your Location Information Server (LIS)? *

- ◯ We have or plan to develop our own LIS
- ◯ We have or plan to contract LIS services from our aggregator
- ◯ We have or plan to contract LIS services from a LIS services provider
- ◯ Not applicable as we only provide wireless

14. At this time, how confident are you that you will be able to meet the timelines established in the FCC 2024 Report and Order FCC-24-78A1 on Facilitating Implementation of Next Generation 9-1-1 Services after a valid Phase 1 request is made? *

- ◯ Extremely confident
- ◯ Somewhat confident
- ◯ Neutral
- ◯ Somewhat not confident
- ◯ Extremely not confident

15. At this time, how confident are you that you will be able to meet the timelines established in the FCC 2024 Report and Order FCC-24-78A1 on Facilitating Implementation of Next Generation 9-1-1 Services after a valid Phase 2 request is made? *

- ◯ Extremely confident
- ◯ Somewhat confident
- ◯ Neutral
- ◯ Somewhat not confident
- ◯ Extremely not confident

You can print a copy of your answer after you submit

Submit