

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

In the Matter of	§	
	§	
Location-Based Routing	§	PS Docket No. 18-64
For Wireless 911 Calls	§	
	§	

JOINT MOTION FOR EXTENSION OF TIME TO FILE REPLY COMMENTS

Pursuant to Section 1.46 of the Commission’s Rules, 47 C.F.R. § 1.46(b), the National Emergency Number Association (“NENA”), the National Association of State 9-1-1 Administrators (“NASNA”), the Texas 9-1-1 Entities¹, West Safety Services, Inc., Comtech Communications, Inc., and CTIA (collectively, the “Parties”) submit this motion for a one-week extension of time to file reply comments response to the Federal Communications Commission’s (“FCC” or “Commission”) Notice of Inquiry (“NOI”) on location-based routing for wireless 9-1-1 calls in the above-captioned proceeding. Currently, reply comments are due June 21, 2018.² The Parties respectfully request an extension through and including June 28, 2018 for reply comments.

¹ The Texas 9-1-1 Alliance, the Texas Commission on State Emergency Communications (“CSEC”), and the Municipal Emergency Communication Districts Association (“MECDA”) are collectively, the “Texas 9-1-1 Entities”. The Texas 9-1-1 Alliance is an interlocal cooperation entity composed of 26 Texas emergency communication districts with E9-1-1 service and related public safety responsibility for more than approximately 63% of the population of Texas. These emergency communication districts were created pursuant to Texas Health and Safety Code Chapter 772 and are defined under Texas Health and Safety Code Section 771.001(3)(B). The Texas CSEC is a state agency created pursuant to Texas Health and Safety Code Chapter 771, and by statute is the state program authority on emergency communications. CSEC’s membership includes representatives of the Texas 9-1-1 Entities and the general public, and directly oversees and administers the Texas state 9-1-1 program under which 9-1-1 service is provided in 206 of Texas’ 254 counties, covering approximately two-thirds of the state’s geography and one-fourth of the state’s population. MECDA is an association of 26 municipal emergency communication districts, as defined under Texas Health and Safety Code Section 771.001(3)(A), that are located primarily in the Dallas-Fort Worth area.

² In the Matter of Location-Based Routing For Wireless 911 Calls, Notice of Inquiry (rel. Mar. 23, 2018) (available at <https://ecfsapi.fcc.gov/file/032340656916/FCC-18-32A1.pdf>).

The Parties recognize that the FCC does not routinely grant requests to extend filing deadlines.³ At the same time, the Commission has previously determined that extensions are warranted when the extension is necessary to ensure that the Commission receives full and informed responses and the affected parties have an opportunity to develop a more complete record for the Commission's considerations.⁴ A modest one-week extension of the reply comment deadline is appropriate in this case.

The extension of time requested herein is being made in advance of the initial comment filing date in order to accommodate a conflict with a major 9-1-1 calendared event. Around the time of the current deadline for reply comments, many of the key organizations and individuals expected to participate in this proceeding will be attending the NENA 2018 National Conference and Expo ("NENA Conference") in Nashville, Tennessee.⁵ The NENA Conference last year attracted nearly 2,400 participants; many of these 9-1-1 officials and users, vendor representatives, and government affairs professionals plan to contribute to their respective organizations' comments and reply comments to the relevant NOI.

Granting a one-week extension of time will allow these critical stakeholders time to review, analyze, and comment on all of the comments in the record, without direct time constraint conflicts between preparing NOI reply comments regarding location-based routing for wireless 9-1-1 calls and other 9-1-1 efforts associated with the NENA Conference. A one-week extension would also enable some of these 9-1-1 subject matter experts to be involved in both 9-

³ See 47 C.F.R. § 1.46(a).

⁴ See, e.g., Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, Order at ¶ 3, DA 10-2267 (PSHSB rel. Dec. 1, 2010) (granting an extension "to ensure that all interested parties have the time necessary to prepare full and informed comments and reply comments").

⁵ <https://www.nena.org/general/custom.asp?page=nenas2018>. The NENA Expo is scheduled to take place from June 16, 2018 to June 21, 2018, with additional 9-1-1 events planned adjacent to the event, such as NASNA's semi-annual meeting, scheduled to take place June 16-17, 2018.

1-1 efforts without direct time constraint conflicts between them, allowing for fuller participation in the NENA Conference (the site of many annual and semi-annual meetings of working groups and other multi-stakeholder bodies). Lastly, an extension will provide the Commission with better prepared and more relevant and useful information in the NOI's reply comments, as commenters will have had the opportunity to expand their perspectives and converse with industry colleagues during the week of the NENA Conference.

For the foregoing reasons, the Parties jointly request that the Commission extend the deadline to file reply comments from June 21, 2018 to June 28, 2018.

Respectfully submitted,

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