

NENA

The 9-1-1 Association

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VIA ELECTRONIC FILING

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

Re: Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations, WT Docket No. 18-197

Dear Ms. Dortch:

NENA, the National Emergency Number Association, is filing this letter in this important docket highlighting the possible benefits to the new company's subscribers when dialing 9-1-1, should the acquisition be approved. NENA recognizes the diligence of the Commission staff - and ultimately the Commissioners - in reviewing acquisitions and mergers. NENA does not typically comment in such proceedings, but chooses to do so in this proceeding simply because of the work that T-Mobile is doing in the 9-1-1 space. Such work, if carried over to the combined companies, will benefit T-Mobile customers when dialing 9-1-1 from their mobile devices. I would like to highlight some of the demonstrated commitment T-Mobile continues to show to 9-1-1, include the following:

- T-Mobile is an active participant and leader in industry efforts to improve 9-1-1, including the indoor location technology test bed and developing the National Emergency Address Database (NEAD).
- T-Mobile does most of its 9-1-1 work in-house, which provides for flexibility and allows it to implement new and innovative 9-1-1 network designs and solutions in a timely manner. For example, T-Mobile has implemented a unique 9-1-1 network design that provides for increased resiliency and diversity, e.g., three active, geographic, and locally redundant GMLCs sites, each capable of handling 100% traffic load for all services, thus mitigating possible issues with access to emergency services.
- Doing 9-1-1 work in-house has led to innovation in other areas, as well. For example, T-Mobile can provide more precise location for text-to-9-1-1 instead of just a cell sector centroid estimate.

- T-Mobile is also one of the industry-leading companies in implementing native Real-Time Text (RTT). This will allow greater access to 9-1-1, especially for the speech and hearing impaired. Sprint currently does not offer RTT and hence, its customers will be able to leverage this new and innovative technology once they become part of the new T-Mobile.
- Regarding device-based hybrid location technology to improve the location of wireless 9-1-1 callers, T-Mobile was one of, if not the first, mobile carriers to implement Apple's HELO technology for 9-1-1 location in 2015. They have begun incorporating Android's device-based hybrid location services over the control plane for new devices starting in June 2018.
- T-Mobile was among the first wireless carriers to implement OTDOA, a network-based location technology for LTE that requires VoLTE implementation. Currently, Sprint does not offer VoLTE or OTDOA. All customers of the new T-Mobile will be able to leverage both technologies.
- T-Mobile was one of the first carriers to complete first functional testing of dispatchable location in the test bed, proving proper network and handset functionality for this important new indoor-location initiative. On Aug 23rd, T-Mobile entered the test bed for dispatchable location performance testing. Sprint currently is not positioned to leverage the NEAD or provide dispatchable location, but its customers as part of the New T-Mobile will be able to benefit from this new and innovative wireless approach to 9-1-1 location.
- T-Mobile is advancing their Next Generation 9-1-1 readiness. Currently, E9-1-1 traffic is leaving the T-Mobile network over IP connections that could terminate to NG9-1-1 service provider networks once they are ready for true all-IP end state NG9-1-1-over-IP and is actively engaged with and a CMRS leader for several state NG9-1-1/ESINet implementations, such as in Washington and Massachusetts.
- T-Mobile has been the industry leader in Wi-Fi calling and OTT communications platforms, e.g., DIGITS. Wi-Fi calling allows consumers to make 9-1-1 calls when not connected to a wireless macro-network or in areas where there is no macro wireless coverage. Both Wi-Fi calling and DIGITS leverage commercially available device provided location rather than relying solely on customer provided 9-1-1 addresses which may not always be updated or accurate.

I fully respect the Commission's acquisition and merger review process and all that it involves, but I wanted to bring to your attention how this transaction will benefit the new entity's customer base when they dial 9-1-1.

Respectfully,



Brian Fontes, PhD

CEO