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September 18, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte, PS Docket No. 13-75

At its September 6, 2018 meeting with members of the Commission's Public Safety and Homeland Security Bureau, Cybersecurity and Communications Reliability Division in the above-captioned proceeding, Motorola Solutions was asked to: (1) consider whether its proposed clarification to the definition of a "covered 911 service provider" would leave any regulatory gaps; and (2) if so, propose language to close such regulatory gaps.

After further consideration, Motorola Solutions suggests a slight modification of its clarification to the "covered 911 service provider" definition, the purpose of which is to add a "regional or state 9-1-1 authority" to the definition. Without this addition, an entity providing 911, E911, or NG911 capabilities or their functional equivalent may not be subject to the covered 911 service provider rules if it provided the services pursuant to direct contract with a regional or state 9-1-1 authority. Below is the modified language (in bold and underline) that Motorola Solution proposes to the current definition of a "covered 911 service provider":

*An entity that "provides 911, E911, or NG911 capabilities such as call routing, automatic location information (ALI), automatic number identification (ANI), or the functional equivalent of those capabilities, **pursuant to a direct contract with** a public safety answering point (PSAP), **regional or state 9-1-1 authority**, statewide default answering point, or appropriate local emergency authority."*

If there are any questions regarding this matter, please contact me.

Respectfully submitted,

/s/ Frank Korinek

Frank Korinek

cc: Guy Benson
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