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September 30, 2016

EX PARTE NOTICE

VIA ELECTRONIC FILING

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

Re: *Transition from TTY to Real Time Text Technology,* CG Docket No. 16-145

Dear Ms. Dortch:

On Wednesday, September 28, 2016, the undersigned, Toni Dunne (via phone) and John Snapp of West Safety Services, Inc. (f/k/a Intrado Inc.) met with David Furth, Timothy May, David Siehl and Brenda Boykin (via phone) of the Public Safety Homeland Security Bureau (PSHSB), Henning Schulzrinne (via phone) of the Office of Strategic Planning & Policy Analysis (OSP), and Karen Peltz Strauss, Suzanne Singleton, Michael Scott, Robert Aldrich and interpreters of the Consumer and Governmental Affairs Bureau (CGB).

The purpose of the meeting was to discuss issues concerning Real-Time Text (RTT) raised in the Commission's *Notice of Proposed Rulemaking* (NPRM) released May 25, 2016 in the above-referenced docket, including the technical issues related to RTT-TTY backwards compatibility and the steps necessary to deploy end-to-end RTT. Specifically, as noted in West Safety's comments and the attached slides presented at the meeting, West Safety expressed its belief that Public Safety Answering Points (PSAPs) would be more inclined to develop and deploy RTT systems if they are assured carriers will deliver RTT. West Safety believes that the Commission's goal should be to limit the period of backward compatibility as much as practicable in order to minimize the impact from TTY 911 failings on IP-based systems and RTT-TTY interoperability inefficiencies. To that end, West Safety supports an RTT deployment solution that includes support for TTY but also encourages users to transition away from TTY swiftly and effectively.

Using the attached slides, West Safety also provided the Commission with insight into potential routing of RTT 911 calls that would allow both voice and data to be transmitted to PSAPs

utilizing existing network elements for SMS text-to-911. West Safety further emphasized that the deployment of RTT must consider PSAP operational impacts and should be implemented in a manner that accounts for both the short-term TTY-RTT transitional goals to support RTT text and call flows using gateways and web and integrated clients, and the long-term goals of integrated clients to support integrated voice and full i3 PSAPs (voice and text) to support native RTT implementation.

West Safety appreciates the opportunity to meet with the Public Safety and Homeland Security and Consumer and Governmental Affairs Bureaus. Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/*Mary A. Boyd*

Mary A. Boyd
VP, Regulatory and Government Affairs
West Safety Services Inc.

cc:
David Furth, PSHSB
Timothy May, PSHSB
David Siehl, PSHSB
Brenda Boykin (via phone), PSHSB
Henning Schulzrinne (via phone), OSP
Karen Peltz Strauss, CGB-DRO
Suzanne Rosen Singleton, CGB-DRO
Michael Scott, CGB-DRO
Robert Aldrich, CGB

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RTT to 9-1-1

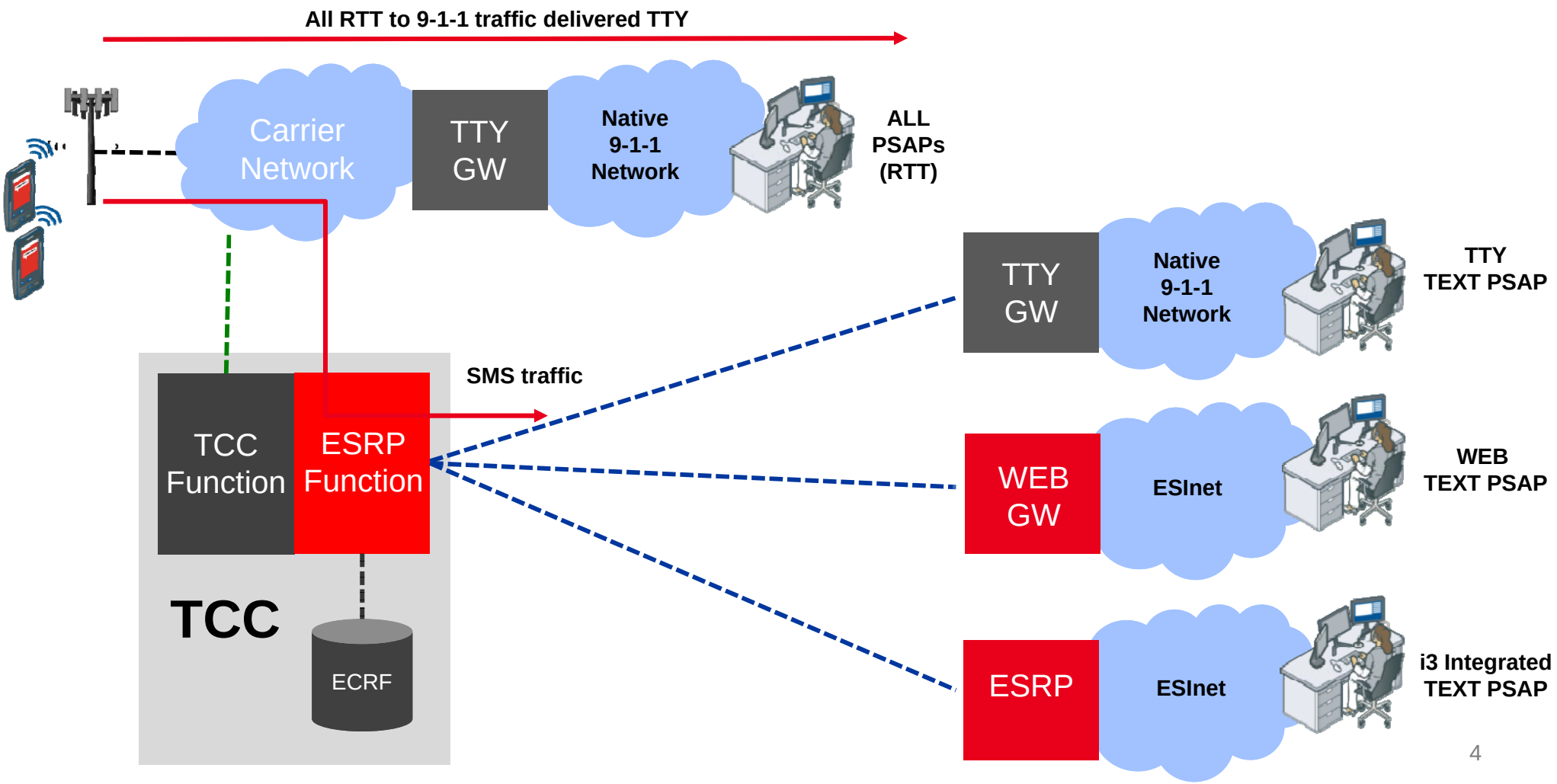
September 28, 2016

John Snapp
VP Technology
West Safety Services

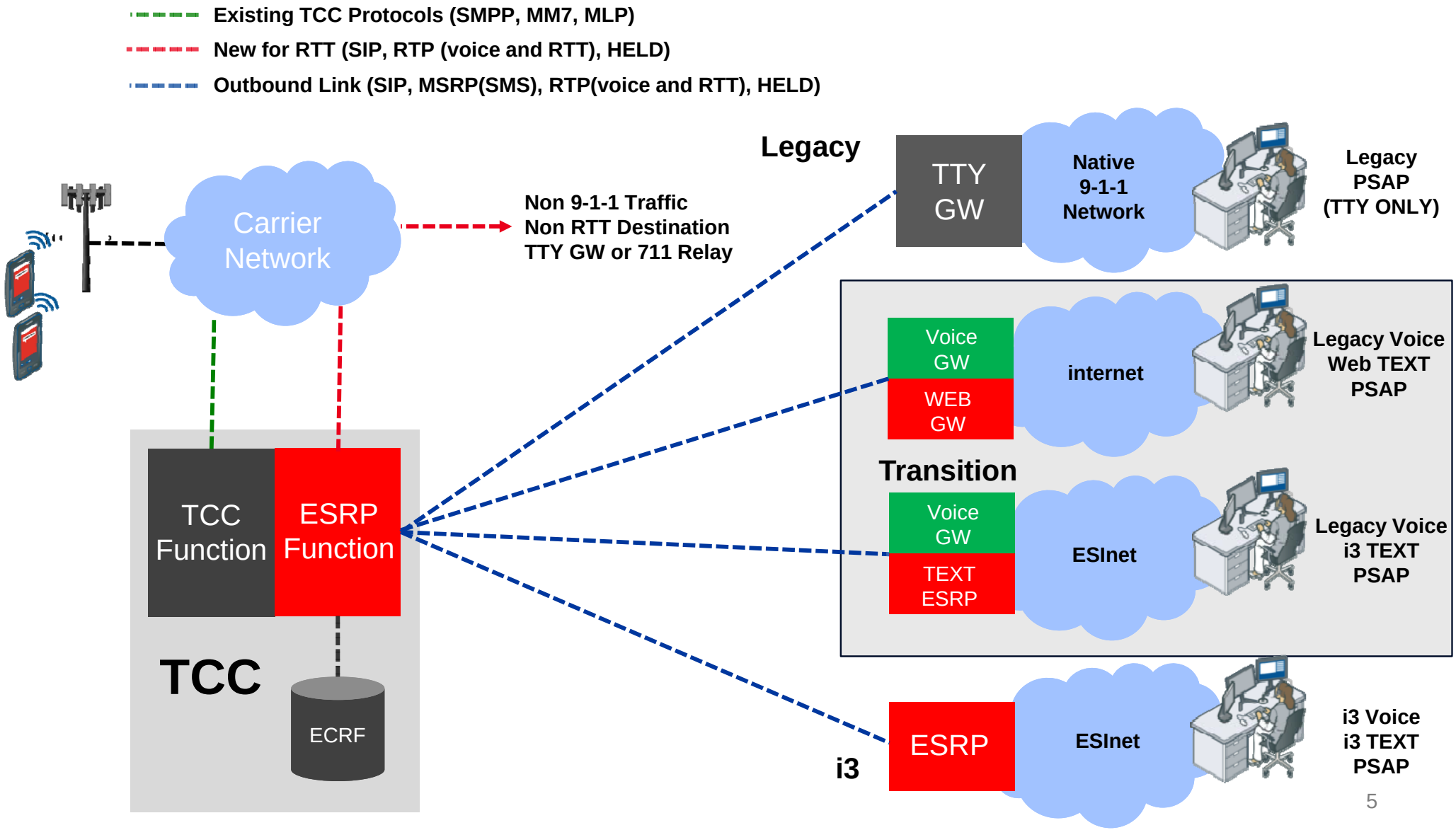
RTT to 9-1-1

- PSAPs will only develop and deploy RTT if they are ensured carriers will deliver it to them.
- Delivering RTT calls over TTY to TEXT enabled PSAPs would be a step backwards.
- SMS-to-911 traffic will begin to shift to RTT-to-911. Without RTT support to PSAPs TTY traffic at TEXT enabled PSAPs will increase.
- A migration to RTT should include support for TTY through a solution that encourages users to transition away from TTY

Delivery 9-1-1 RTT via TTY



RTT delivery to PSAPs



RTT to PSAPs changes needed

- **Initial Implementation Steps (Stage 1)**
  - Carriers route all RTT to 9-1-1 traffic to gateway as they do with SMS today
  - Web and Integrated clients upgraded to support RTT text (voice via GW)
  - TCC complex enhanced to support RTT
    - Ingress and egress links to support RTT call flow
    - TTY GW to support RTT call flow
    - Implementation of voice GW for legacy text implementations
- **Longer Term Implementation Steps (Stage 2)**
  - Integrated clients to support integrated voice and text
  - Full i3 PSAPs (Voice and Text) to support native RTT implementation

PSAP RTT Implementation

- Stage 1 PSAP side can be deployed as a software upgrade
- Stage 1 TTC / ESRP transition functionality independent of PSAPs
- Stage 1 implementation possible within 2017-2018 timeframe
- Stage 2 as a pure i3 voice / RTT text model is implemented

RTT Issues to be considered

- TTY Transcoder overloading
- RTT Default off
- 711 relay could be used for all NON 9-1-1 ingoing and outgoing TTY traffic to RTT devices