

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

In the Matter of

Connect America Fund

Developing a Unified Intercarrier
Compensation Regime

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WC Docket No. 10-90

CC Docket No. 01-92

REPLY COMMENTS OF THE TEXAS 9-1-1 ENTITIES

The Texas 9-1-1 Alliance,¹ the Texas Commission on State Emergency Communications,² and the Municipal Emergency Communication Districts Association³ (collectively, the “Texas 9-1-1 Entities”) respectfully submit the following brief reply comments to the September 8, 2017, Public Notice in the Federal Communication Commission’s (the “Commission”) above-referenced proceedings. In the Public Notice, the Commission invited interested parties to update the record

¹ 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).

² The Texas Commission on State Emergency Communications (“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.

³ The Municipal Emergency Communication Districts Association (“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.

on issues raised by the Commission in the *2011 ICC Transformation FNPRM* regarding (1) the network edge for traffic that interconnects with the Public Switched Telephone Network, (2) tandem switching and transport, and (3) transit (the non-access traffic functional equivalent of tandem switching and transport).⁴

I. Potential overlap between certain IP Transition and NG9-1-1 transition issues

The Texas 9-1-1 Entities submit reply comments because of the potential overlap between IP Transition and Next Generation 9-1-1 (“NG9-1-1”) transition issues. The reasons for our reply comments in a proceeding not focused on 9-1-1 service are similar to the points raised recently by T-Mobile in their initial comments regarding IP Transition and Points of Interconnection (“POI”).⁵

⁴ *Wireline Competition Bureau, Parties Asked to Refresh the Record on Intercarrier Compensation Reform Related to the Network Edge, Tandem Switching and Transport, and Transit*, WC Docket No. 10-90 and CC Docket No. 01-92 (rel. Sept. 8, 2017) (available at <https://apps.fcc.gov/edocs/public/attachmatch/D1-17-863A1.doc>).

⁵ T-Mobile commented that since 2011 the telecommunications market has continued to evolve and technology has changed. In order to achieve the benefits of the transition to IP, T-Mobile opines that the Commission should “eliminate rules that are slowing the transition from legacy transmission platforms and services to those based fully on the Internet Protocol (the “IP Transition”). . . .should also exercise its authority under the Communications Act of 1934, as amended, (the “Act”) to create incentives for service providers voluntarily to expedite the IP Transition. T-Mobile also explains why Commission action is necessary now, as follows:

The industry on its own will not be able to reduce the number of POIs. Action by the FCC is necessary for several reasons. First, no single carrier, or even trade association of carriers, is in a position to successfully coordinate the efforts of the entire industry, the FCC, and the state public utility commissions to migrate from one POI per LATA to a few POIs for the entire country. Second, the FCC's rules are ambiguous with respect to the proper allocation of costs for interconnection arrangements where the POI is beyond the LATA or the ILEC's service area. Carriers will not migrate to a few POIs for the entire country if they do not know how the related interconnection costs will be allocated (or recovered). Third, some smaller rural carriers may need support to offset the costs associated with a migration from one POI per LATA to a few POIs for the entire country, which no carrier or trade association could provide on its own. The FCC is uniquely able to lead and oversee coordinated efforts among the industry and the states to address each of the challenges, and it has the authority under the Act to do so.

See, Comments of T-Mobile, USA, Inc. in WC Docket No. 10-90 and CC Docket No. 01-92 at p. i and at pp. 8-9 (Oct. 26, 2017) (available at <https://ecfsapi.fcc.gov/file/102614548315/T-Mobile%20Comments.pdf>).

In the context of NG9-1-1 transition, particularly the deployment of Legacy Network Gateways (“LNGs”) associated with NG9-1-1, the issue of one POI per local access transport area (“LATA”) for Time-Division Multiplexing (“TDM”) Interconnection may apply two-fold because the need for redundancy might necessitate having two POIs for 9-1-1 traffic in a LATA. For example, the issue of one POI per LATA, in the context of NG9-1-1, has been raised in the past before the Commission, but was not specifically ruled on by the Commission in that context.⁶ Additionally, a 2013 National Emergency Number Association (“NENA”) information document sought to provide additional information on potential demarcation implications of LNG POI issues with regard to NG9-1-1 transition, while recognizing certain demarcation issues were beyond the scope of what could be addressed by NENA.⁷ The NENA information document also sought to explain the demarcation difference between TDM interconnection to the LNGs and IP connection to a NG9-1-1 system Emergency Services Routing Proxy (“ESRP”) and Border Control Function (“BCF”), and how these differences may impact potential deployment and the relative costs of either party.⁸

⁶ Comments of Level 3 Communications in PS Docket No. 10-255 at p. 14, footnote no. 4 (Mar. 1, 2011) (available at <https://ecfsapi.fcc.gov/file/7021033116.pdf>).

⁷ See, NENA Potential Points of Demarcation in NG9-1-1 Networks Information Document at pp. 9-10 (available at https://c.ymcdn.com/sites/www.nena.org/resource/resmgr/Standards/NENA-INF-003.1.1-2013_Potent.pdf):

2.6.4 Policy and Financial Issues Regarding Demarcation of the LNG

Configuration of demarcation for the LNG has some interdependencies with the rollout schedule for actually implementing the equipment. As of this writing, there exists no clear precedent for the migration path from and[sic] SR(s)-only environment to one which uses LSRG(s) and/or LNG(s). ... Deployment of the LNG is currently an unknown cost in future NG911 networks. Demarcation is the primary catalyst for shifting cost towards either party, and as there exists no consensus for a single form of demarcation, there exists no clear guidance for determining the responsibility for funding the LNG. This would appear to call for the development and of regulations to establish standardized demarcation points and the respective roles and responsibilities of the parties.

⁸ *Id.* at p. 24:

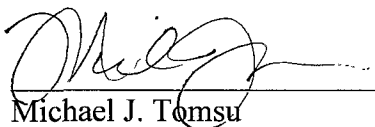
For reasons similar to those raised by T-Mobile in its initial comments, if the Commission decides to act further to facilitate IP Transition (specifically with respect to POIs), the associated issue of NG9-1-1 POIs should be considered in the same or a separate proceeding. Specifically, the Commission should consider POIs in the context of NG9-1-1, including interconnection via TDM to LNGs and interconnection via IP to NG9-1-1 system POIs, *e.g.*, ESRP and BCF.

II. Conclusion

The Texas 9-1-1 Entities appreciate the opportunity to provide the foregoing reply comments on these IP Transition matters, and respectfully request that the Commission take action in a manner consistent with these reply comments.

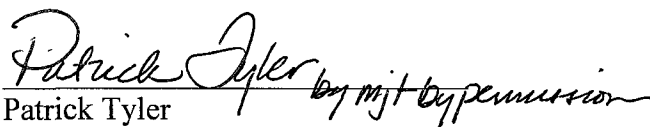
The defining difference between Demarcation A (TDM side of LNG) and B (IP side of LNG) is whether the originating carrier's network connects to an IP interface or to a TDM interface. If the 9-1-1 Authority supplies the LNG, then the carrier must only connect its TDM trunks to that LNG. If the originating carrier provides the LNG, then the 9-1-1 Authority will accept IP traffic provided by the originating carrier. This distinction brings with it significant differences in the deployment and relative costs of transmission infrastructure committed to the NG9-1-1 network by either party.

Respectfully submitted,




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On the comments:

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November 10, 2017