

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications)	PS Docket No. 11-153
)	
Framework for Next Generation 911 Deployment)	PS Docket No. 10-255

COMMENTS OF L.R. KIMBALL

L.R. Kimball (Kimball), a CDI Company, of Ebensburg, Pennsylvania hereby submits comments in response to the Federal Communications Commission’s (Commission) *Third Further Notice of Proposed Rulemaking* released by the Commission on August 13, 2013, in the above captioned proceeding.

Kimball is one of the nation’s largest engineering/architecture/consulting firms, annually ranked among the top 200 design firms and the top 20 telecommunications firms by Engineering News Record. Kimball’s Communications Technology Division has offered public safety and mission critical consulting services for more than 15 years. Our communications technology practice is focused on all facets of public safety, supporting operations and technologies; 911 networking, call delivery and call handling; radio communications; cyber security; and public policy.

COMMENTS

A. Roaming Support

Kimball believes that it is important to create and maintain a nationwide parity of service across providers and geographies. Kimball agrees that access to 911 through text messaging is

just as critical for roaming consumers as it is for consumers utilizing a home CMRS provider's network, especially because consumers may be unaware of when they are roaming.¹ Kimball reiterates comments of NENA and APCO regarding the general consumers' inability to determine when they are roaming.² The lack of a roaming solution for text-to-911 poses a risk to subscribers of smaller and rural CMRS providers, and further threatens the inequality of 911 services for deaf, hard of hearing and speech impaired people who subscribe to carriers that largely rely on roaming, or unknowingly travel outside of their carrier's home service. Kimball urges the Commission to consider how it will educate these at-risk subscribers of the unavailability of consistent text-to-911 service. Kimball supports the roll out of text-to-911 service for the benefits that it provides, but strongly encourages a national public education campaign that sets expectations regarding the limitations of text-to-911 service.

Kimball supports the Commission establishing a timeframe for development of roaming solutions. While we understand that carriers are focused on developing next generation systems that would support these services, Kimball believes that interim text-to-911 solutions are necessary to keep up with public expectation of 911 system capabilities, including roaming, and should be developed in parallel with next generation solutions.

Kimball agrees with NENA's observation that device deployment and capability will drive the use of roaming for text-to-911 service and NENA's proposal for a two-step approach and a timeline that takes handset development cycles into account makes sense. Kimball

¹ Second Further Notice, 29 FCC Rcd at 1565-66 ¶ 48 (adding that "carrier coverage maps may reflect coverage where [consumers] may only have roaming agreements"). See also Further Notice, 27 FCC Rcd at 15707-08 ¶¶ 124, 126.

² NENA Second Further Notice Comments at 10. We recognize that some handset screens may display either a symbol or other indication that a consumer is roaming. However, this is not always the case. For instance, some CMRS providers may offer all-inclusive service plans that do not differentiate between a subscriber remaining in the CMRS provider's service area or roaming; APCO Second Further Notice Comments at 6.

generally agrees with NENA's proposed timeline and opt-out provision, however, internet protocol and next generation transitions are primarily a transport function and Kimball does not believe that a severe impact exists to providers that must develop interim solutions during long term next generation and internet protocol transitions.

Kimball believes that CSRIC should examine roaming. Kimball recommends that CSRIC be tasked with defining "roaming" and further defining how significant of an impact the inability to text-to-911 while roaming will be for subscribers while the solution is still in development. Carriers should be compelled to share information on how often they support roaming on their networks. CSRIC could further examine the effort required from carriers to allow text-to-9-1-1 to work while roaming and a reasonable timeframe for that effort. This information would allow the Commission to determine if rulemaking is needed for an interim roaming solution or if pushing for a full next generation-compatible solution would be advantageous.

D. Future Texting Services

Scope of text-to-911 service and requirements. Based on public expectations, Kimball agrees with the Commission's ultimate goal that text-to-911 be available on all text-capable media, regardless of the transmission method (e.g., whether texts are delivered by IP or circuit-switched networks). However, Customer Premise Equipment (CPE) manufacturers will need to be consulted in all stages of planning and implementation toward that goal since CPE technologies will need to be capable of processing the delivery of messages through varying transmission methods.

Non-interconnected text applications. Kimball believes that public expectation will eventually drive the need for non-interconnected text services to offer text-to-911 services,

however, the technologies and participants are very different from those that the Commission addresses in its recently adopted rules. Therefore, Kimball recommends that the Commission begin to engage the relevant stakeholders that would be impacted by a non-interconnected text ruling and gauge the interest, willingness and capability of these participants to work with the Commission toward text-to-911 services.

The Commission should encourage relevant stakeholders to implement text-to-911 platforms by conducting an outreach and educational campaign to engage relevant stakeholders by hosting technology showcases and work sessions across the United States to get stakeholders engaged and aware of the technological and policy issues and motivated to work through solutions.

Rich media text services. Kimball is aware that PSAP personnel are concerned not just with the potential for an information overload of data, but also for the emotional impact that receiving photos and videos will have on calltakers. Individual PSAPs desire the ability to determine when and how they will receive multimedia messages in order to effectively control the flow of new data and mitigate any negative impact that this new media could have on their operations and personnel. These determinations have the potential to differ substantially based on the size and culture of each PSAP, so the Commission should impose requirements on covered text providers to restrict multimedia information to PSAPs that assure that PSAPs control the intake of data while mitigating burdens on providers. Input from PSAP representatives will be necessary in order to determine what information is required for a call for service.

In order to efficiently handle multimedia technologies, PSAPs will need to update records retention processes and policies, update call taker training plans including stress management,

update the PSAP Standard Operating Procedures and ensure all systems equipment is capable of handling the additional data.

The NENA PSAP Operations Committee currently has a working group developing an informational document on “Task Overload.” This working group is developing information on the number of tasks that can be completed in both a pre-NG9-1-1 and NG9-1-1 environment.

Any multimedia message could pose a cybersecurity risk to a PSAP. Policies will need to be developed to assure that messages are “clean” before delivery to PSAP CPE.

Real-Time Text. While we understand and support the EAAC’s recommendation that “standards and functional requirements be adopted that are technically and economically feasible” to achieve direct access to 911 using, among other IP-based text communications, real-time text communications.³ The Commission should consider the ability of PSAPs to receive these in the interim because of the lack of internet at the majority at PSAPs and the unwillingness to grant internet access because of security concerns. It might need to wait for a true next generation deployment because of connectivity. The Commission cannot mandate that PSAPs have internet connection and cannot rely on the fact that they do.

³ See CVAA § 106(c)(8). EAAC Report and Recommendations at 23.