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November 13, 2014

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

Re: *Improving 9-1-1 Reliability*, PS Docket No. 13-75; *PSHSB Inquiry into Circumstances of Major 911 Outage Centered in Washington State April 9-10, 2014*, PS Docket No. 14-72

Dear Ms. Dortch:

On Wednesday, November 12, 2014, Richard Muscat, of Regulatory Affairs for the Texas 9-1-1 Alliance, and I discussed matters in the above-referenced two dockets via teleconference with Brendan Carr, Legal Advisor to Commissioner Pai. Both of these dockets are on the agenda for the November 21, 2014 meeting.

It is our understanding that the Commission is considering possible actions to adjust the federal 9-1-1 regulatory framework. In our discussions with Mr. Carr, we noted that, consistent with prior comments by the Texas 9-1-1 Entities on this issue, while 9-1-1 is primarily a local, regional, and state regulatory matter, for issues that involve Internet Protocol (IP) and 9-1-1 service, the current local, regional, and state 9-1-1 regulatory framework may have “gaps” or be insufficient in some respects. These “gaps” could be responsibly addressed by an additional federal regulatory 9-1-1 framework, especially in the case of 9-1-1 interconnection and 9-1-1 system reliability—given that all wireline, wireless, VoIP, and IP providers must interface with, and rely on, the 9-1-1 system for their customers. However, we also discussed that any additional federal regulatory 9-1-1 framework must be accomplished in a balanced and reasonable manner, in order to continue to ensure that diligent and reputable vendors committed to public safety will fully participate in bringing the best technology and products to the 9-1-1 market.

Mr. Muscat and I also noted that in Texas, six regional 9-1-1 governmental entities have received Public Utility Commission of Texas certification to provide 9-1-1 database management service. Most of these received certification within sixty (60) days of application. Two of those 9-1-1 governmental entities have also expanded that certification

to include 9-1-1 network services. To the extent that an additional federal regulatory 9-1-1 framework certification is required, qualified applicants (including qualified applicants that may be 9-1-1 governmental entities) should be able to obtain such federal certification to provide 9-1-1 database management, 9-1-1 network, or other 9-1-1 aspects within a similarly reasonable period.

In accordance with the Commission's rules, this letter is being filed electronically with the Secretary for inclusion in the public record.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael J. Tomsu", with a long horizontal flourish extending to the right.

Michael J. Tomsu
Attorney for the Texas 9-1-1 Alliance

cc: Brendan Carr