

**Before the  
Federal Communications Commission  
Washington, DC 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
	)	

**REPLY COMMENTS OF NTCA–THE RURAL BROADBAND ASSOCIATION**

I. INTRODUCTION AND SUMMARY

NTCA–The Rural Broadband Association<sup>1</sup> (“NTCA”) hereby submits these reply comments in response to the Federal Communications Commission’s (the “Commission’s”) Second Report and Order and Third Further Notice of Proposed Rulemaking, which seeks comment on technical issues related to providing enhanced location information and roaming capabilities for texts sent to 9-1-1.<sup>2</sup> While NTCA’s members remain committed to providing their rural consumers with 911 solutions, NTCA adds its voice to the chorus of network providers pointing out the often insurmountable hurdles for compliance. As the Rural Wireless Association (“RWA”) points out, while small rural wireless may ultimately be capable of delivery enhanced location information and supporting roaming, the technical solutions will not be available to small carriers within the time frame contemplated.

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<sup>1</sup> NTCA represents nearly 900 rural rate-of-return regulated telecommunications providers. All of NTCA’s members are full service local exchange carriers and broadband providers, and many provide wireless, video, satellite, and/or long distance services as well.

<sup>2</sup> *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, Framework for Next Generation 911 Deployment*, Second Report and Order and Third Further Notice of Proposed Rulemaking, FCC 14-118 (Aug. 13, 2014).

The Commission proposes requiring covered text providers to deliver enhanced location information with texts to 911 within two years of the adoption of final rules.<sup>3</sup> The Commission notes that the “majority of commenters indicate that delivery of enhanced location information is not possible at this time,” but believes that “solutions could be developed to provide enhanced location” information within the proposed two-year time frame.<sup>4</sup> However, the record does not support the assertion that enhanced location information will be universally available. The FCC’s Communications Security, Reliability and Interoperability Council’s Working Group 1 issued a report in June concluding that achieving enhanced location capabilities will require user equipment changes, network changes, or both.<sup>5</sup> Small providers are always last to receive equipment and given that significant development time will be required before equipment is made available to any provider, it will take more than two years for most small wireless providers to be in a position to provide enhanced location information with texts to 911.

The Commission also seeks comment on whether solutions could be developed to provide SMS text-to-911 roaming within two years.<sup>6</sup> AT&T points out that no industry-wide agreement exists on how SMS texting could be retrofitted to allow roaming subscribers to text public safety while on a serving network.<sup>7</sup> While an approach to achieve text-to-911 may ultimately be developed, ample time must be allotted for the industry to implement it. Two years is not enough time for the development and implementation of a roaming text-to-911 solution. NTCA supports the approach suggested by the National Emergency Number Association

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<sup>3</sup> *Third FNPRM* ¶82.

<sup>4</sup> *Id.* ¶¶ 82, 84.

<sup>5</sup> Communications Security, Reliability and Interoperability Council, Working Group 1, Next Generation 9-1-1, Task 1 Subtask, Final Report – Investigation into Location Improvements for Interim SMS (text) to 9-1-1, June 2014.

<sup>6</sup> *Third FNORM*, ¶ 109

<sup>7</sup> Comments of AT&T, p. 5.

(“NENA”), that the Commission establish a three year deadline for roaming support on existing platforms, extendable to five years for carriers who commit to supporting next generation compatible text service on a network-wide basis.

All commenters in this proceeding unanimously agree that enhanced location information and roaming capabilities for texts sent to 9-1-1 are important. Small, rural carriers share the public safety goals of the Commission. However, it will take some time before standards are developed, equipment is made available and necessary upgrades are made. The Commission’s proposed two year timetable is not reasonably achievable and should be extended based on the record developed in this proceeding.

Respectfully submitted,



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