



State of Vermont
Enhanced 9-1-1 Board
94 State Street
Montpelier, VT 05620-6501
E911-info@state.vt.us

[phone] 802-828-4911
[fax] 802-828-4109
[TTY] 802-828-5779
[800 VT] 800-342-4911

January 26, 2015

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

Re: Notice of Ex Parte Presentation - Facilitating the Deployment of Text-to-911 and Other Next Generation Applications, PS Docket No. 11-153 and Framework for Next Generation 911 Deployment, PS Docket No. 10-255

Dear Ms. Dortch:

The State of Vermont Enhanced 9-1-1 Board (Board) is providing this letter to enhance the record related to the text to 9-1-1 proceedings at the Federal Communications Commission.

In November, 2013 and again in June, 2014, the Board put a letter into the record to catalog Vermont's experience with text to 9-1-1 up to that point in time. We have had text to 9-1-1 service from Verizon since April, 2012 and ran a successful trial with Sprint later in that same year. In September, 2013, AT&T began to provide text to 9-1-1 service as part of a trial. Following the start of that trial, we launched a public education campaign to inform the public about what was then 90% availability of text to 9-1-1 statewide. All four nationwide carriers were providing the service by May, 2014, and Vermont was the first state to have this important new service available statewide to over 98% of the wireless subscribers and visitors to Vermont. This letter captures the experience we've had with text to 9-1-1 since the first trial with Verizon Wireless in April, 2012 and the data is inclusive of what we reported in the first two submissions.

As previously noted, we recognize that our experience may or may not be indicative of what others will experience. At the same time, what are emerging as patterns in the types of text contacts appears consistent with anecdotal evidence from other jurisdictions.

Since April of 2012, 909 texts to 9-1-1 have been processed and received. 355 of those texts were tests sent as part of the implementation of each new carrier. The 554 non-test texts break down as follows:

- 62 confirmed accidental texts where no emergency existed.
- 144 appeared to be accidental texts, but we were not able to confirm the status due to a lack of location information and/or because the individual did not

respond when the call taker asked where their emergency was.

- 38 were contacts regarding a crime that were not deemed to be an emergency
- 11 were repeat texts from the same person that were not emergencies, where we had to take action to stop the unnecessary texts (first and still only confirmed incident of “spam”).
- 3 that we suspected were “spam” but we were unable to confirm.
- 85 were continuations or follow ups to a previous text session reporting an emergency.
- 209 were legitimate emergencies that required some type of response. Those emergencies included auto accidents, burglaries, intruders, erratic driving, drug dealing, assaults and threats of assault. 19 were related to suicide threats and 18 involved domestic violence situations. We are aware of one text sent by a person who was deaf since the last time we wrote.
- 2 that remain unclassified.

It remains clear that this is an important tool for certain individuals, in certain situations, to seek help. We continue to be careful to market this new service to those individuals who can most benefit: individuals who are deaf or hard of hearing or have speech impairment and individuals who are in a dangerous situation where making a voice call would put them in further danger. We have incorporated the “Call If You Can, Text If You Can’t” slogan into a new logo for Vermont 9-1-1.

We are convinced that many of the concerns expressed about adopting text to 9-1-1 were without a basis in fact. The concern about folks replacing voice calls with text has proven to be a non-issue. We have few examples of unnecessary texting, and few incidents of spamming.

We are hopeful that other jurisdictions will share their experience in order to better build out the record on this important initiative.

Sincerely,

David H. Tucker
Executive Director
Enhanced 9-1-1 Board