



March 23, 2015

VIA ELECTRONIC SUBMISSION

*EX PARTE NOTICE*

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: **PS Docket No. 14-193** In The Matter Of 911 Governance and Accountability  
**PS Docket No. 13-75** In The Matter of Improving 911 Reliability

Dear Ms. Dortch:

On Thursday, March 19, 2015, Craig W. Donaldson Senior Vice President, Regulatory, Government & External Affairs - Intrado, and Kim Robert Scovill, Vice President Governmental and External Affairs – Intrado, met with the following FCC Staff; David Furth, Tim May, Eric Schmidt, and Lauren Kravetz, all from the Commission’s Public Safety and Homeland Security Bureau.

The discussion centered on Intrado’s review of, and initial reactions to, the FCC’s November 21, 2014 Policy Statement and Notice of Proposed Rulemaking (NPRM) in the above-noted dockets.<sup>1</sup> Intrado discussed the history of 911, Intrado’s history, the current state of leadership in the 911 arena, and the current state of 911 networks and technology. Being the oldest continuous provider of 911 services, and with its distinguished record of innovation in 911, Intrado’s history is inexorably intertwined with that of 911, E911, and Next Generation 911 (NG911) services. Therefore, Intrado has a deep, genuine, and continuing commitment to working with the Commission and all industry stakeholders in the shared goals of increasing the efficiency, utility, availability, and reliability of all 911 services, and in particular the migration to NG911.

Intrado explained that, even though the Commission’s NPRM drives an important national dialogue and highlights the long-overdue need for certain 911 governance reforms, it is unfortunate that the new and modified rules proposed in the docket are not supported by law, are counter to technical standards, and their overly burdensome nature will not further the goals noted above. Intrado expressed the opinion that the FCC’s authority over 911 is limited to the specific Congressional authority granted to it which does not include authority over intrastate 911 calling services. However, Intrado agrees that the FCC plays an important, and even indispensable, role in coordination of 911 nationwide, and the Commission’s expertise and partnering is a valuable adjunct to the states and local public safety.

Intrado expressed its view that the perpetuation of 911 rules and regulations developed in the era of monopoly telephone service providers cause perverse results in the current competitive 911/NG911 environment. Intrado cited examples of this and explained how the Commission, within its existing Congressional authority, can have an immediate positive impact in resolving such issues.

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<sup>1</sup> [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-14-186A4.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-14-186A4.pdf)

Intrado expressed its belief that actions such as this and renewed commitment to the accelerated transition to nationwide NG911 service are the appropriate regulatory roles for the FCC, not trying to supplant state and local control. Intrado did not provide any documents as part of this meeting.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter and a copy of materials presented during this meeting, if any, are being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please direct any questions as to this matter to the undersigned.

Sincerely,

/s/

Kim Robert Scovill, Esq.  
Vice President – Government and External Affairs

cc: David Furth  
Tim May  
Eric Schmidt  
Lauren Kravetz