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VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: 911 Governance and Accountability, PS Docket No. 14-193 and Improving 911 Reliability, PS Docket No. 13-75

Dear Ms. Dortch:

On Wednesday, April 29, Jim Bugel, Cathy Carpino, Mike Tan, and the undersigned from AT&T met with Admiral David Simpson, David Furth, and Eric Schmidt from the Commission's Public Safety and Homeland Security Bureau about the 911 Governance and Accountability proceeding.

AT&T stated that there appears to be universal support for the goal of the proceeding to improve accountability and reliability for public safety networks but there is significant disagreement about whether the proposed rules would accomplish this goal and this spans the spectrum of public safety groups as well as 911 System Service Providers. AT&T reiterated its position that the proposed rules won't result in a zero defect 911 network, but will still have a significant impact on the cost of providing service and, unavoidably, the costs eventually charged to PSAPs. AT&T also noted that the increased costs to the industry resulting from the 911 Reliability Order (Derecho Order) have not yet been quantified or passed along to the PSAPs. And despite the FCC's best intentions, the launch of this proceeding and the uncertainty generated from the proposed rules has already affected the marketplace for 911 public safety solutions. Most notably, contract negotiations for Next Generation 911 solutions have slowed awaiting further developments at the FCC.

AT&T recommended that the Commission allow more time for the industry to work through the issues highlighted in the 911 Governance and Accountability NPRM. Specifically, we suggested that the Commission direct the Communications, Reliability, Security, and Interoperability Council (CSRIC), a special task force, or the existing Optimal PSAP Architecture Task Force to develop recommendations for these issues in advance (or in lieu) of adopting new rules.



Finally, AT&T noted that it would be worthwhile for the industry to meet with public safety to discuss these issues and develop some basic principles that could be used as a voluntary agreement while these issues are studied in more detail in the various FCC forums noted above.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced dockets. Please do not hesitate to call me if you have questions.

Sincerely,

/s/ Joseph P. Marx
Assistant Vice President, AT&T Services Inc.

Cc:
Admiral David Simpson
David Furth
Eric Schmidt