

October 15, 2015

Via electronic mail

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

Re: Request for Extension to Time to File Certification--Dockets No. 13-75, 11-60

Dear Ms. Dortch:

TeleCommunication Systems, Inc. ("TCS"), pursuant to 47 C.F.R. § 1.3, requests an extension of the time in which it must file any Initial Reliability Certification required by 47 C.F.R. § 12.4 and Federal Communications Commission ("FCC") Orders in the above-referenced proceedings. TCS requests a six week extension so that the uncertainty regarding whether TCS is a Covered Service Provider or whether some of its services fall within the scope of 47 C.F.R. § 12.4 can be resolved.

There is good cause to grant TCS' request. The aforementioned uncertainty arose because based upon the FCC's Derecho Report and Order (FCC13-158) TCS did not believe that it needed to certify configurations because it was providing NG911 components to state and local government entities in support of their moving to NG911. Because, however, the Order also mentioned functional equivalence to ALI/SR legacy E911 components, TCS requested informal guidance from FCC staff to determine if it was misinterpreting the order. Based upon this informal guidance, TCS has decided that some of its configurations should perhaps be certified based upon criteria involving hosted ESInet or shared tenant configurations.

TCS has 92 unique customer configurations for ESInet and Call Handling solutions; the majority of these will not need to be certified based upon the informal guidance it received, but TCS is going through each configuration to determine if its characteristic rises to the certification threshold. Each customer configuration has a unique blend of hosted versus in-network elements, ownership of equipment arrangements, and TCS-primed, or sub-contracted network facilities. TCS has 5 different channel partnerships with differing demarcation and responsibility arrangements; it wishes to avoid duplication of certification and thus must coordinate with its channel partners, as appropriate.

TCS has identified at least one major configuration that it does wish to certify and hope, to have that configuration entered into the certification system by the Oct. 15th due date. Further, it is TCS' current understanding, certification requires the identification of each

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May 8, 2014

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PSAP in the configuration being certified, and this information needs to be gathered and validated.

TCS is therefore requesting a six-week extension so as to provide the full set of reviews appropriate to and in response to the informal guidance received by the Commission.

Please direct any questions to the undersigned.

Sincerely,

Stinson Leonard Street LLP

A handwritten signature in blue ink, appearing to read "H. Russell Frisby, Jr.", written over a faint, mirrored watermark of the same signature.

H. Russell Frisby, Jr

HF:SLS

cc: Admiral David G. Simpson