

The Honorable Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, SW, Washington, DC 20554

November 19th, 2015

Re: Comment regarding petition seeking a declaratory ruling clarifying the regulatory status of mobile messaging services (WT Docket No. 08-7)

Dear Chairman Wheeler:

Thank you for the opportunity to provide comments to the petition seeking a declaratory ruling clarifying the regulatory status of messaging services. Remind101, Inc. (Remind) is in support of the petition filed on August 28, 2015, asking the Commission to declare that Title II of the Communications Act governs messaging services.

Our mission at Remind is to improve education by connecting every teacher, student, and parent in the world. Remind is a communication tool that helps teachers communicate instantly with students and parents with quick, simple messages to any device. Teachers typically send homework and assignment reminders, classroom updates, and motivational messages via Remind. Teachers in three out of four school districts in the United States actively use Remind. We have delivered more than 2 billion messages to over **30 million students and parents enrolled in approximately 65,000 K-12 schools.**

Teachers use Remind's messaging tools to collaborate with parents, keep students engaged and on track, and extend learning beyond the classroom. Text messaging is an important communication channel. For many students and parents, mobile messaging is the only way to interact effectively. Privacy and security are important, and with Remind, personal contact information is kept private.

Remind uses normal telephone numbers (10 digit "long code" numbers) from the North American Numbering Plan. This provides a superior user experience to short codes. It allows Remind to facilitate two-way conversations that scale to support our large user base. Using regular telephone numbers means that teachers, students, and parents don't have to learn and remember the keywords and inconvenient syntax of short codes in order to communicate. People already know how to message between normal telephone numbers.

The current carrier practices of contextually filtering messages, applying arbitrary rules on traffic balance, volumetric filtering, and blacklisting of telephone numbers are causing irreparable harm to teachers and students. These practices are executed at the sole and arbitrary discretion of the carriers, without notice or recourse to applications like Remind. Because of this, more than 150,000 teacher/student interactions per day are being disrupted. For some types of

correspondence, the effective rate of blocking is 100%. These are only the disruptions that we hear about from our educator community; carriers are not consistent in their reporting.

Carriers have no business inserting themselves into these important and private communications between teachers, parents, and students. Each of these parties pays their wireless carriers to deliver messages reliably, and without interference, to their intended destination.

Remind has experienced the impact of these practices first-hand. Messages are blocked for classrooms with large numbers of students. Teachers' telephone numbers are blacklisted. Carriers have arbitrarily decided to suspend message communications from teachers' phone numbers. Critical content such as important reminders and links to homework assignments are blocked because of misidentification as SPAM. This kind of behavior is not tolerated for voice calls -- It should not be tolerated for messaging.

The negative effects of carrier filtering is particularly severe in the case of the population served by Remind. 77% of teenagers have cell phones, but fewer than a quarter of those are smartphones. While many students, especially in high poverty areas, lack the digital tools necessary to complete homework assignments, most do have phones with basic messaging capabilities. For students who do receive messages from teachers, Remind has observed significant reduction in absenteeism, improvement in literacy outcomes, and more students successfully completing plans to enroll in college. Likewise, parents who receive messages from teachers are more likely to engage with their students at home and with the school. Without reliability of message delivery, these benefits suffer or disappear. Furthermore, no alternative confers anywhere near the advantage of messaging.

Teachers and students should have the choice of using messaging with the clear expectation that when they send a message that the wireless carriers will dutifully deliver those messages to the proper destination as intended by the sender. If messaging were classified as a Title II Communication Service then the current practices and policies of the wireless carriers would be prohibited.

We urge the Commission to support our nation's teachers and students, foster innovation in the classroom, and ensure consumer choice by declaring that Title II of the Communications Act governs messaging services.

Sincerely,

Brett Kopf
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