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VIA ELECTRONIC FILING

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

Re: *In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*, PS Docket No. 11-153; and *In the Matter of Framework for Next Generation 911 Deployment*, PS Docket No. 10-255

Dear Ms. Dortch:

On February 4, at the request of staff, Brian Daly, Peter Musgrove, and I (of AT&T), met via teleconference with David Furth, Tim May, David Siehl, and Brenda Boykin of the FCC's Public Safety and Homeland Security Bureau. The purpose of the meeting was to answer questions posed by staff on the current state of work being done in industry standards development organizations on text-messaging platforms. The questions from staff, along with our responses, are as follows.

1) Have any technical solutions been developed that would support location and/or roaming for SMS-based text-to-911 without requiring retrofitting existing SMS platforms?

As we have explained previously, current SMS-based text-to-911 service cannot be supported in a roaming scenario.[1] Improvements on the existing "coarse location," via commercial location-based services (LBS), may be available on a best-effort basis, and is currently supported by the current ATIS/TIA Joint Standard for SMS-to-911 (J-STD-110v2) and associated implementation guidelines in J-STD-110.01v2.

2. If no such solutions have been developed, what is the status of work on solutions, including work on industry standards, e.g., J-STD-36 as compared to J-STD-110, and the relevant protocols, e.g., Open Mobile Alliance RTP Protocol, that may be applicable to text-to-911 over non-SMS text platforms? Does it make any difference whether those solutions are based on the User Plane (SUPL) or Control Plane (e.g., the current CMRS network)?

[1] Comments of AT&T, PS Docket 11-153, at 5-6 (October 16 2014).

None of the standards solutions for location or roaming for next generation services (e.g., ATIS' Multimedia Emergency Services (MMES)) apply to SMS-based text-to-911 or MMS-based text-to-911, whether via User Plane or Control Plane. The Real Time Text (RTT) service provides significant advantages over all of TTY, SMS-based text-to-911 and MMS-based text-to-911 (see answer to question #3 below).

3. **What are the enhanced location capabilities of RTT? Can RTT support text-to-911 service and in what timeframe? What are RTT's characteristics, including enhanced location, under roaming scenarios?**

Because RTT uses VoLTE procedures for the setup of an emergency call, an RTT call to emergency services will be able to take advantage of all enhanced location capabilities available to VoLTE calls. Since the handset is making the emergency call as opposed to sending a text message, the device is placed into emergency mode, which allow all VoLTE devices to attempt Assisted GPS and Observed Time Difference of Arrival as well as fallback to Enhanced Cell ID location technologies. Operators and vendors are currently involved in ATIS efforts to standardize RTT procedures to allow for users (including those with disabilities) to communicate with each other and with emergency services. The timeframe for support of RTT in the operator networks is still pending. However, if current schedules hold, the standard for RTT is expected to be published by mid-year 2016. And, typically, 18-24 months is needed from the time of the completion of standards to the first testing in the operator networks.

RTT works whether someone is in their home area or roaming. Unlike SMS-based text-to-911, the same enhanced location capabilities are available whether RTT users are in their home networks or roaming on other networks, just like VoLTE emergency calls.

4. **What, if anything, do PSAPs have to do to upgrade their systems to receive RTT or MMS texts and accompanying location data?**

In order to receive MMS or RTT text messages, PSAPs would have to implement the standards being developed in ATIS for RTT, and the existing ATIS standard, J-STD-110, for MMS text.

In the case of MMS text messages, adherence to the standards will allow Text Control Centers (TCCs) to deliver MMS text messages to PSAPs as SMS text messages. However, all other aspects beyond simple text are outside the scope of existing standards. PSAPs that wish to receive the multimedia files associated with the original MMS messages can use proprietary solutions developed by their TCC vendor for handling those multimedia files.

For RTT, the TCC is not needed. A legacy network gateway can be used to allow RTT users to communicate with legacy PSAPs via TTY for text communication.

While not discussed during the February 4th meeting, we would like to emphasize, consistent with our prior advocacy in this proceeding, that any mandates to support roaming within the current SMS-based text-to-911 service effectively would require a re-architecting of the entire SMS platform. Should the FCC decide to mandate such an outcome, this development work would not

even begin until after the effective date of an FCC Order. Accordingly, the quickest path for the support of text-to-911 in a roaming scenario would be via the RTT platform as discussed herein.

As requested by staff, this letter is being filed in the above-referenced dockets via the Commission's ECFS system. Should you have any questions regarding the above, please feel free to contact me directly.

Sincerely,

Cc: (via e-mail)

Mr. David Furth, Federal Communications Commission, PSHSB
Mr. Timothy May, Federal Communications Commission, PSHSB
Mr. David Siehl, Federal Communications Commission, PSHSB
Ms. Brenda Boykin, Federal Communications Commission, PSHSB