



May 12, 2011

Marlene H. Dortch
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

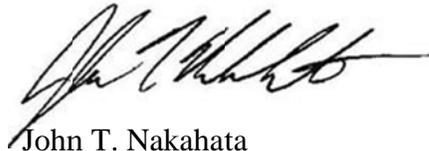
Re: *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, WC
Docket No. 05-196; *Framework for Next Generation 911 Deployment*, PS Docket
No. 10-255

Dear Ms. Dortch:

On May 11, 2011, Ryan Jensen, Tim Dunn, Jim Nixon, and Steve Sharkey, all of T-Mobile USA, Inc.; Kristine Devine of Wiltshire & Grannis LLP; and I spoke with David Furth, Deputy Chief, Public Safety and Homeland Security Bureau, and Patrick Donovan, Aaron Garza, Erika Olsen, Timothy May, Henning Schulzrinne and Stanley Scheiner, all from the Public Safety and Homeland Security Bureau. During the meeting, T-Mobile discussed its comments and reply comments in the above-referenced proceedings. In particular, T-Mobile discussed next-generation 911 capabilities and transition issues, as outlined in the attached presentation, as well as Phase II wireless location technology. T-Mobile cautioned that the demarcation of responsibilities of all stakeholders needs to be clear in any transition to NG911.

In accordance with the Commission's rules, copies of this letter and the attachment are being filed electronically in the above-referenced dockets.

Sincerely,



John T. Nakahata
Counsel for T-Mobile USA, Inc.

Attachment

Cc: Patrick Donovan
Henning Schulzrinne
Aaron Garza
David Furth
Erika Olsen
Timothy May
Stanley Scheiner

NG911 – Presentation to Public Safety and Homeland Security Bureau

PS Docket No. 07-114
WC Docket No. 05-196
May 11, 2011

stick
together®

Key Benefits of NG911

Bringing IP communications capabilities to emergency response will –

- Improve emergency response.
- Allow new kinds of information to be transmitted to public safety.
- Increase flexibility of carriers and public safety to provide 911 access to all consumers across different modes of technology – as public safety becomes able to receive and utilize those modes.

Flexibility Afforded by NG911

NG911 will provide flexibility to adapt to new technologies and circumstances.

- Increased access to mobile broadband.
- Untethering PSAPs from physical network.
- Provide PSAPs with access to variety of information sources.

T-Mobile has been actively participating in NENA processes to help realize the benefits of NG911.

NG911 Standards

Coordination and cooperation among all players is necessary.

- New standards should ensure all parties cooperate in advancing NG911 adoption.
- Timelines should account for all players.
 - Clear processes for determining readiness of PSAPs and regions.
 - Require regional coordination for rollout of NG911 systems.
- Responsibilities of service providers and of PSAPs should be clearly delineated – learning from the Phase II experience.

NG911 Standards

Significant changes to the entire 911 system needed.

- New standards should reflect this total overhaul.
- Standards must be forward looking and comprehensive.
- Avoid “patchwork” of standards seen in today’s 911 system.
- Respect current technical and economic limitations.
- Avoid interim solutions where possible.

SMS – Not Able to Support Reliable 911.

SMS ≠ Text to 911.

SMS has intrinsic shortcomings in the 911 context.

- Not session-based.
- No guaranteed real time delivery.
- No guarantee messages will be received in order.
- Does not support location technologies (lack of time for location fix).
- Lacks adequate security features (e.g. spoofing).

PSAPs Not Ready for SMS to 911

PSAPs lack capability to use SMS for 911 in any effective way.

- Most PSAPs are not configured to receive SMS messages.
- Those that are cannot overcome SMS's shortcomings.
- Unlikely that interim SMS-to-911 would be rolled out nationwide, causing significant consumer confusion and creating public safety issues.

Look Beyond SMS to True Text-to-911

Text-to-911 will be a true, two-way, conversational service

- The Commission should direct its resources to encouraging adoption of IP-based networks and systems
 - Support real-time, conversational multimedia communications
 - Support routing and location over IP
- Investing time, effort, and money now on SMS-to-911 risks delaying adoption of those technologies

