

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Reliability and Continuity of Communications Networks, Including Broadband Technologies)	PS Docket No. 11-60
)	
Effects on Broadband Communications Networks Of Damage or Failure of Network Equipment or Severe Overload)	PS Docket No. 10-92
)	
Independent Panel Reviewing the Impact of Hurricane Katrina on Communication Networks)	PS Docket No. 06-119

**JOINT INITIAL COMMENTS OF THE TEXAS COMMISSION ON STATE
EMERGENCY COMMUNICATIONS AND THE TEXAS 9-1-1 ALLIANCE**

The Texas Commission on State Emergency Communications¹ and the Texas 9-1-1 Alliance² (collectively referred to herein as the “Texas 9-1-1 Agencies”) respectfully submit the following joint initial comments in response to the Notice of Inquiry (“NOI”) initiating a comprehensive examination of issues regarding the reliability, resiliency, and continuity of communications networks, including broadband technologies, against the backdrop of today’s increasingly

¹ The Texas Commission on State Emergency Communications (“CSEC”) is a state agency created pursuant to Texas Health and Safety Code Chapter 771, and is the state authority on emergency communications. CSEC oversees the implementation of 9-1-1 service provided by Texas’ 24 Councils of Government, which serve approximately two-thirds of the geographic area of Texas and one-third of its population.

² The Texas 9-1-1 Alliance is an interlocal cooperation entity composed of 24 Texas Emergency Communication Districts with E9-1-1 service and public safety responsibility for approximately 53% of the population of Texas. These districts were created pursuant to Texas Health and Safety Code Chapter 772.

interconnected world, one in which communications services play a critical role in all segments of our nation's society and economy.³

The Texas 9-1-1 Agencies support the Commission's efforts to develop a dialogue with all interested stakeholders, including 9-1-1 public safety authorities, on the important issues raised in the NOI. The provision of 9-1-1 emergency communications is inextricably intertwined with these issues because, as the Commission stated, "[p]eople dialing 9-1-1, whether using legacy or broadband-based networks, must be able to reach emergency personnel for assistance."⁴ Similarly and additionally, in the Notice of Inquiry on Next Generation 9-1-1 ("NOI NG911"), the Commission recognized that "[t]he IP-based nature of NG911 architecture, and its complex relationship with other systems, gives rise to concerns about maintaining the security, integrity, and reliability of NG911 networks and information," and sought comment on "how to address these concerns."⁵

Accordingly, as the Commission and interested stakeholders initiate a continuing dialogue to address the issues raised in the NOI, it is imperative that these issues be addressed in the context of legacy 9-1-1 networks, transition/migration 9-1-1 IP networks, and NG911 networks. The Texas 9-1-1 Agencies respectfully urge that in this comprehensive examination of issues regarding the reliability, resiliency, and continuity of communications networks, the Commission and all interested stakeholders address these issues in a manner that promotes and furthers the deployment of reliable and resilient IP networks for NG911.

³ *In the Matter of Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket No. 11-60, Notice of Inquiry (rel. Apr. 7, 2011).

⁴ *Id.* at ¶ 5.

⁵ *In the Matter of Framework for Next Generation 911 Deployment*, PS Docket No. 10-255, Notice of Inquiry (rel, Dec. 21, 2010) at ¶ 77.

Respectfully submitted,

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On the comments:

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