

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

COMMENTS OF AGERO, INC.

Agero, Inc. (formerly the ATX Group)¹ submits these comments in response to the Commission’s *Notice of Proposed Rulemaking (NPRM)* addressing facilitating 911 text communications and the overall framework of Next Generation 911 (NG 911).²

The Commission’s pursuit of reliable text messaging to 911 Centers is well grounded. From an automotive telematics technology context, Agero believes reliable 911 text messaging can serve as a foundation for NG 911. It will enable meaningful incident specific passenger, vehicle and highway information to be transmitted to and acted upon by the 911 Center.³ It will

¹ On December 5, 2011, Cross Country Automotive Services and its subsidiary, the ATX Group, announced its new corporate brand name, Agero. Agero’s telematics services are provided to vehicle owners through the brand names of its customers: Hyundai, Toyota, Lexus, Infiniti, BMW, PSA Peugeot Citroen and Rolls-Royce Motor Cars. Agero also manages emergency roadside assistance programs in the US on behalf of global automobile manufacturers and US insurance carriers. Services include post-accident scene management and total loss screening services for US insurance carriers. See Comments of ATX, In the Matter of Framework for Next Generation 911 Deployment, *Notice of Inquiry*, FCC 10-200, PS Docket No. 10-255 (December 21, 2010) filed February 28, 2011 (ATX *NOI* Comments). Agero is a member of the Cross Country Group of companies.

² In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications and the Framework for Next Generation 911 Deployment, *Notice of Proposed Rulemakng*, FCC 11-134, PS Docket No. 10-255 and PS Docket 11-153 (September 22, 2011), 76 Fed Reg 63257 (October 12, 2011).

³ 911 Center and public safety answering point (PSAP) are used interchangeably in this Comment.

provide a transition path for more comprehensive information on the NG 911 platform. The result will improve emergency response.

The Commission describes text-capable communication formats- Short Message Service (SMS), IP based messaging, and Real-Time Text (RTT) and compares their characteristics, strengths, and limitations in supporting 911 emergency communications. While noting debate addressing SMS' ability to provide reliable 911 service and its location accuracy limitations,⁴ SMS is suggested as an interim solution for text-based communication to 911. Further comment addressing SMS as a 911 text solution is sought.⁵ The *NPRM* also seeks comment on integrating and standardizing IP-based text-to-911 as commercial providers migrate to all-IP networks and 911 authorities deploy Emergency Services IP networks (ESInets). The *NPRM* reiterates the Commission's objective to provide citizens access to 911 through voice, text, photos, video, and data.⁶

Agero believes reliable 911 text based communications can serve as groundwork for NG 911. Vehicle incident information available today can more effectively be transmitted and acted upon by the 911 Center via data rather than voice. Currently, Agero can provide location, airbag deployment, vehicle make, model and color and number of passengers information to the correct PSAP. Agero response specialists, via the voice connection to the vehicle, can determine each occupant's gender and whether any are under the age of 12 or older than 55.⁷ In several models, information generated from in-vehicle crash sensors – including delta velocity of impact, the number of impacts, direction of impact, whether the vehicle has overturned, and whether seat

⁴ *NPRM* at paragraphs 49 -52.

⁵ *NPRM* at paragraphs 3-5.

⁶ *NPRM* at paragraph 8.

⁷ ATX *NOI* Comments at page 7, footnote 8.

belts were engaged is available.⁸ Notably, unlike SMS only service, telematics provides location information consistent with the Commission's rules.

This information can be transmitted in a comprehensive yet manageable format via text to 911 Centers able to receive it. The information can be structured so emergency response officers can act on it and not be distracted by organizing it.⁹ The clarity and efficiency by which it is transmitted, as well as how it is presented, will make a meaningful difference to the speed and quality of response. As the *NPRM* notes, 911 text communications can evolve to provide robust advanced automatic collision notification (AACN) where cumulative vehicle data resulting from an incident is used to calculate risk of severe and life-threatening injury factors to the vehicle occupants.¹⁰

Examining requirements public safety thinks Next Generation 911 should embrace, the Transportation Safety Advancement Group (TSAG)¹¹ emphasizes the universal agreement that automotive telematics be able to access and integrate into the NG 911 platform.¹² The TSAG report details separate recommendations by law enforcement, fire-rescue, emergency medical

⁸ Currently, seat belt engagement determination is limited to front seats.

⁹ As noted in ATX's *NOI* comments, Agero is working with a joint APCO-NENA working group and the National Academy of Emergency Dispatch to develop standards and protocols requiring all telematics information to be transmitted to the 911 Center in a common format. See *Vehicular Emergency Data Set (VEDS), Recommendation, Version 2.0 Prepared: (March 2004) by the ComCARE Alliance ACN Data Set Working Group, Version 3.0 Prepared: (February 2011) by the Advanced Automatic Crash Notification (AACN) Joint APCO/NENA Data Standardization Working Group. ATX Comments at page 12.*

¹⁰ *NPRM* at paragraphs 23 and 73.

¹¹ TSAG is sponsored by the Research & Innovative Technology Administration and the National Highway Traffic Safety Administration of the US Department of Transportation. The *NPRM* notes the TSAG report at paragraph 21.

¹² *Report from Law Enforcement, Fire-Rescue, Emergency Medical Services and Transportation Operations Stakeholders Panels, Next Generation 9-1-1, Transportation Operations Stakeholder Panels, Transportation Safety Advancement Group (August 30, 2011).* <http://www.tsag-its.org/tsaglibrary.php>

services (EMS) and transportation operations on information that should be transmitted and acted upon by end users of NG 911 systems.

Each discipline stressed telematics access to the NG 911 platform as a source to improve emergency response and officer safety. Core telematics data- vehicle type, location, speed, airbags deployed, seat belt data, number of passengers and whether the vehicle has overturned are noted. The TSAG report also recognizes the value of AACN's crash severity and injury prediction. Meaningful telematics information allows officials to assign appropriate resources, plan their response and approach to the scene, mitigate challenges and rescue and treat victims more efficiently and effectively.¹³ It allows accident scene and adjacent artery traffic to be better managed.¹⁴

A reliable interim 911 text format, embraced by the public, 911 Centers, other emergency agencies and carriers and providers will serve as a path to NG 911. Agero cautions that proposals where SMS or other formats are at the option of PSAPs, providers and vendors¹⁵ will not contribute to NG 911's foundation. Disparate practices across the 911 network will likely deter public and private investment and confuse the public.

The debate regarding SMS capabilities should address not only whether it can reliably deliver 911 text messages but also whether it presents an effective transition to the NG 911 platform. If it cannot, a voluntary regime contributes uncertainty, creating concern that investment will be lost. In such circumstance, a voluntary environment is likely to result in no commitment or investment later abandoned. If there is a credible premise that 911 text

¹³ TSAG August 31, 2011 Report at page 40.

¹⁴ TSAG August 31, 2011 Report at pages 7, 9, 24, 40, 55, 58, 61, 73, 75 and 77.

¹⁵ *NPRM* at paragraph 54.

messaging is a building block to NG 911 communications, public and private investment will commit.

A voluntary regime will likely confound consumers. The number of PSAPs and the geographic area encompassed by each is not intuitive to even the most knowledgeable. The current nationwide 911 system is a symbol of comity across local, state and federal governments and carriers. Once regulatory changes are decided, compliance is pursued. Consumers comprehend that technologies evolve, regulations are adjusted to reflect such and public and private investment requires time to conform. A voluntary 911 text messaging regime runs counter to this historic premise. A voluntary system with disparate capabilities across jurisdictions and no clear path to NG 911 stands in contrast to consumer expectation. The value of having some 911 text connectivity will be outweighed by the uncertainty and confusion it will create.

The circumstances do not invite NG 911 investment. Automotive telematics remains a market driven technology and service, relying on no mandate. Investment is obtained and committed by broadening the vehicle base and the original equipment manufacturers (OEMs) and their telematics providers pursuing operational efficiencies. Agero's model, by which vehicles only communicate with the call center, remains a critical element of operational efficiencies. It does not rely on pervasive use of the public switch network or its IP network successor. Customers remain steadfast in seeking to first connect to the call center and not 911.¹⁶ A voluntary and disparate 911 texting regime that lacks consumer, public agency and industry embrace and is an unknown of how it contributes to NG 911 is a fragile investment and technical scenario to pursue.

¹⁶ ATX *NOI* Comments at page 6.

Agero urges the Commission to pursue a 911 text messaging format that will serve as the foundation of NG 911 and its objective to improve emergency response. Automotive telematics can contribute by providing meaningful refined and manageable incident specific information. It will enable emergency response to make more informed and timely decisions locating an emergency, assisting the victims and managing the incident.

Respectfully submitted,

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