

**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
)	

**INITIAL COMMENTS OF THE TEXAS 9-1-1 ALLIANCE
TO THE NOTICE OF PROPOSED RULEMAKING**

THE TEXAS 9-1-1 ALLIANCE

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Table of Contents

	<u>Page No.</u>
Executive Summary	1
A. Facilitating the Short-Term Deployment of Text-to-9-1-1	4
B. Facilitating the Long-Term Deployment of NG9-1-1 Text and Multimedia Applications; PSAP-Based Triggers; the Commission’s Role in Expediting Deployment of Text-to-9-1-1 and Other NG9-1-1 Applications; and Legal Authority	7
C. Consumer Education and Disclosure Mechanisms	14

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The Texas 9-1-1 Alliance¹ respectfully submits the following initial comments on certain specific aspects of the evolution towards NG9-1-1 systems and capabilities in response to the Federal Communications Commission (the “Commission”) Notice of Proposed Rulemaking (“NPRM”).²

Executive Summary

The Texas 9-1-1 Alliance supports the Commission’s conclusion as stated in the NPRM that Public Safety Answering Points (“PSAPs”), providers, and vendors should continue to have “the option” to implement short-term text-to-9-1-1 alternatives on a voluntary agreed basis.³ The initial voluntary agreed efforts on short-term trials and deployments of text-to-9-1-1 around the nation provide actual data in the least burdensome manner. Putting aside the identified

¹ 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.

² In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications and Framework for Next Generation 911 Deployment, PS Docket Nos. 11-153 and 10-255 (rel. Sep. 22, 2011).

³ NPRM at ¶ 54.

limitations of using SMS-to-9-1-1 for emergency services, the current comparison information available on SMS Relay for 9-1-1 appears to have attributes generally enabling the widest and quickest deployment in the short-term for people with disabilities, and IP-Relay appears to have attributes for use on an interim basis. Notwithstanding what may occur in the short-term or interim basis for people with disabilities, efforts towards enabling better text-to-9-1-1 solutions for people with disabilities should continue to remain a high priority for the long-term. Separate and apart from agreed voluntary efforts, it is reasonable to conclude that mandatory requirements on text-to-9-1-1 for the much larger general public population present more complex operational and technical concerns, potential for abuses, and vastly increased public education needs than the short-term or interim basis efforts for people with disabilities.

While it can be easy to get caught up in the details associated with long-term deployment of NG9-1-1 texting and multimedia applications, a major threshold regulatory event that needs to occur is for the Commission to provide clarification of the proper federal-state regulatory framework for the transition to NG9-1-1 systems. The Commission recently provided such threshold views on the proper federal-state regulatory framework for bill-and-keep in the Intercarrier Compensation Order (“ICC Order”) and associated Further Notice of Proposed Rulemaking (“FNPRM”).⁴ Consistent with point number four of Chairman Genachowski’s five-

⁴ Connect America Fund (WC Docket No. 10-90); A National Broadband Plan for Our Future (GN Docket No. 09-51); Establishing Just and Reasonable Rates for Local Exchange Carriers (WC Docket No. 07-135); High-Cost Universal Service Support (WC Docket No. 05-337); Developing an Unified Intercarrier Compensation Regime (CC Docket No. 01-92); Federal-State Joint Board on Universal Service (CC Docket No. 96-45); Lifeline and Linkup (WC Docket No. 03-109) and Mobility Fund (WT Docket No. 10-208), Report and Order and Further Notice of Proposed Rulemaking (rel. Nov. 18, 2011) at ¶790 (“We now conclude that a uniform, national framework for the transition of intercarrier compensation to bill-and-keep, with an accompanying federal recovery mechanism, best advances our policy goals of accelerating the migration to all IP networks, facilitating IP-to-IP interconnection, and promoting deployment of new broadband networks by providing certainty and predictability to carriers and investors”).

point plan for NG9-1-1 -- which provides that the Commission will work with state authorities and governing entities “to develop a coordinated approach to next-gen 911 governance,”⁵ in the context of NG9-1-1 transition, the Commission as a threshold issue must clarify its views on the proper local, state, and federal roles. Otherwise, given what has occurred since the Vonage Order on pre-emption, states and regions cannot reasonably be expected to confirm anything to the Commission as proposed in the NPRM on whether “as a pre-condition to Commission action, states should be required to demonstrate that they have adopted appropriate or removed outmoded legal or regulatory measures to facilitate NG911 deployment”⁶ This matter is especially important and timely given recent efforts associated with the sunset of the public switched telephone network (“PSTN”).

The Texas 9-1-1 Alliance respectfully submits that the Commission should build on its recent efforts in the ICC Order and FNPRM on IP-to-IP interconnection⁷ and enable the transition to NG9-1-1 by clearly and affirmatively declaring that *as long as it is done in a manner consistent with the Commission’s deployment goals for transition to NG9-1-1 systems deployments and capabilities*, the following three regulatory framework roles apply as general matters: (1) states and regions are not pre-empted if they are seeking in good faith to implement or modify E9-1-1 regulations that address technical and operational policy, certification, quality and security for NG9-1-1 systems; (2) the declaration in paragraph 1011 of the ICC Order that “we expect all carriers to negotiate in good faith in response to requests for IP-to-IP

⁵ “FCC Chairman Genachowski Announces Five Step Action Plan to Improve the Deployment of Next Generation 9-1-1 (NG911),” Fact Sheet at 1 (Aug. 10, 2011) (“Fact Sheet”).
http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-309005A1.pdf

⁶ NPRM at ¶99.

⁷ FNPRM at ¶¶1335-1339.

interconnection ...”⁸ applies equally, if not more strongly, to good faith requests for them to connect to IP ESInets and NG9-1-1 systems; and (3) the same expectation to negotiate in good faith provided for in the ICC Order on IP-to-IP interconnection applies to states and regions requesting that carriers connect to NG9-1-1 systems.

On the issue of public education for NG9-1-1, the Texas 9-1-1 Alliance agrees with prior comments by Motorola that ultimately the communications industry, device manufacturers, states, regions, localities, the Commission, and other federal agencies must all be responsible and actively involved in education efforts and making educational information widely available on websites and other media. These efforts should take place on a regular and continuing basis during the transition from the PSTN to a fully IP voice and multimedia and multi-device environment for requesting emergency assistance.

A. Facilitating the Short-Term Deployment of Text-to-9-1-1

The voluntary agreed efforts on short-term trials and deployments of text-to-9-1-1 around the nation provide valuable initial data in the least burdensome manner and are to be commended. These initial voluntary agreed efforts are helpful to evaluate known and previously undiscovered technical, operational, personnel, training, education, and scope availability issues for short-term, interim basis, and long-term text-to-9-1-1 options, and it is appropriate for the Commission to continue facilitating such voluntary agreed efforts. As such, the Texas 9-1-1 Alliance supports the Commission’s tentative conclusion in paragraph 54 of the NPRM for PSAPs, providers, and vendors to continue having “the option” to implement short-term alternatives under appropriate circumstances on a voluntary agreed basis.

⁸ ICC Order at 1011 (“In particular, even while our FNPRM is pending, we expect all carriers to negotiate in good faith in response to requests for IP-to-IP interconnection for the exchange of voice traffic”); *see also* FNPRM at ¶1335 and at ¶1341.

The Texas 9-1-1 Alliance also supports the ongoing work evaluating and comparing solutions for people with disabilities by the Commission’s Emergency Access Advisory Committee (“EAAC”)⁹ and the related work of the Alliance for Telecommunications Industry Solutions (“ATIS”) Interim Non-Voice Emergency Services (“INES”)¹⁰ and the Telecommunications Access Rehabilitation Engineering Research Center (“RERC”), Trace R&D Center at the University of Wisconsin-Madison and the Technology Access Program at Gallaudet University¹¹ on issues including whether the identified limitations of SMS for emergency services outweigh the benefits on a short-term or an interim basis for people with disabilities. Concerns associated with SMS for emergency requests have been identified in prior reports to the Commission.¹² While the EAAC and ATIS INES documents are scheduled to be

⁹ “The mission of the Emergency Access Advisory Committee is to make recommendations to the FCC regarding policies and practices for the purpose of achieving equal access to emergency services by individuals with disabilities, as a part of the migration to a national Internet protocol-enabled emergency network, also known as NG911.” <http://www.fcc.gov/encyclopedia/emergency-access-advisory-committee-eaac>

¹⁰ “The Interim Non-Voice Emergency Services (INES) Incubator is working to identify interim solution(s) for text-based wireless communications to existing 9-1-1 services as an alternative to the text telephone system (TTY) while Next Generation 9-1-1 (“NG9-1-1”) solutions are under development. The INES held its first meeting in April 2011, and plans to complete its work by the end of 2011.” <http://www.atis.org/ines/>

¹¹ Emergency Communications by People with Disabilities: Documents from the Telecommunications Access RERC, *Central 911 SMS (PDF) (7-6-11)* (Emergency mobile text communication for people who cannot use voice calls), *Comparison of Short Term Solutions to Text Mobile Communicator Access to 911 (PDF) (7-6-11)*. <http://trace.wisc.edu/911text/>

¹² Communications Security, Reliability and Interoperability Council (“CSRIC”) Working Group 4B, Transition to Next Generation 9-1-1, Final Report (March 2011) at 5.2.4.1.1, which provides:

5.2.4.1.1 Texting in E9-1-1

In the existing E9-1-1 environment, “PSAPs should be able to receive and reply to e-mail, SMS and store and forward messages. However, because of their latency and unreliable delivery, such messaging is problematic for emergency communication and users should be educated as to of limitations inherent to these services.” This recommendation is an exact duplicate of the recommendation made in the referenced NRIC VII report in late 2005—it continues to be recommended. (Footnotes from original omitted)

made available in early December 2011 and putting aside the identified limitations of using SMS-to-9-1-1 for emergency services, the July 2011 work from RERC on SMS Relay for 9-1-1 appears to have attributes generally enabling the widest and quickest deployment in the short-term for people with disabilities, and IP Relay appears to have attributes for use on an interim basis. The Commission's recognition of public expectations on location information, sequence of text messages, and existing recommendations for reducing potential for delays such as those associated with emergency calls via IP Relay services should be considered for short-term and interim basis efforts.¹³

In the case of people with disabilities and those infrequent instances where people have valid reasons for not wanting someone to hear them make a 9-1-1 call in an emergency situation, texting to 9-1-1 may not be significantly different to PSAP operations or significantly alter the workload that occurs today with TTYs, given the potential number of callers.¹⁴ On the other hand, if the much larger general public population chose to simply text-to-9-1-1 for every accident on a highway or other emergency situation when there is no valid reason that they could not make a more reliable and efficient voice call, then this may have a radically different impact on PSAP operations and workload than occurs today. Similarly, if the Commission were to do anything other than clarify to the general public population that the cellular *non-service initialized* 9-1-1 requirement does *not* apply to text-to-9-1-1 from wireless phones or wireless

¹³ NENA Video Relay Service & IP Relay Service PSAP Interaction OID, NENA 52-502 February 12, 2008 Version 1 at 4.2 provides: "it is recommended that IP Relay providers have a system that allows the user to indicate the call is an emergency, and prioritize and route inbound calls to a 'qualified' 9-1-1 CA."

¹⁴ For example, as noted in the NPRM, the trial in the City of Durham, North Carolina is specifically designed for two types of emergency scenarios: "emergency help requests from people with disabilities and from people not wanting someone to hear them make a 911 call." NPRM at ¶44.

tablets, then the issue of text-to-9-1-1 by the general public would be significantly different and more problematic for PSAP operations and workload.

Notwithstanding what may occur in the short-term for people with disabilities, efforts towards enabling better text-to-9-1-1 solutions for people with disabilities should continue to remain a high priority for the long-term. Separate and apart from agreed voluntary efforts, it is reasonable to conclude that mandatory requirements on text-to-9-1-1 for the much larger general public population present more complex operational and technical concerns, potential for abuses, and public education needs than the short-term or interim basis efforts for people with disabilities.

B. Facilitating the Long-Term Deployment of NG9-1-1 Text and Multimedia Applications; PSAP-Based Triggers; the Commission's Role in Expediting Deployment of Text-to-9-1-1 and Other NG9-1-1 Applications; and Legal Authority

There are numerous details associated with long-term deployment of NG9-1-1 texting and multimedia applications, such as: (i) what should be the triggering event demonstrating PSAPs have sufficiently deployed NG9-1-1 systems before mandating carriers to comply with a *bona fide* request to provide NG9-1-1 texting and multimedia applications; and (ii) the status of ongoing standards development issues associated with NG9-1-1 texting and multimedia applications. These are undeniably important issues deserving attention, and these issues are getting attention by industry groups, standards bodies, public safety and CSRIC and associated working groups.¹⁵ But a major threshold regulatory event that needs to occur to enable NG9-1-1 text and multimedia applications for the long-term is for the Commission to clarify how states and other governing entities can view the proper federal-state regulatory framework for the transition to NG9-1-1 systems. The Commission recently provided such threshold views on the

¹⁵ <http://transition.fcc.gov/pshs/advisory/csric/>

proper federal-state regulatory framework for bill-and-keep in the ICC Order and associated FNPRM.¹⁶ It is important for the Commission now to do so in the context of the transition to NG9-1-1.

The Texas 9-1-1 Alliance urges prompt Commission action consistent with point number four of Chairman Genachowski's five-point plan for NG9-1-1 released in August 2011, which provides that the Commission will work with state authorities and governing entities "to develop a coordinated approach to next-gen 911 governance."¹⁷ The Commission must clarify its views on the proper local, state, and federal roles. Otherwise, given what has occurred recently regarding pre-emption since the issuance of the Vonage Order,¹⁸ states and regions cannot reasonably be expected to "demonstrate that they have adopted appropriate or removed outmoded legal or regulatory measures to facilitate NG911 deployment."¹⁹ Notwithstanding that the express reservation to the states set forth in Section 253 of the federal Telecommunications Act of 1996 ("FTA96") to "protect the public safety and welfare"²⁰ in the context of NG9-1-1 may result in the Commission viewing the federal-state regulatory framework significantly and fundamentally different than any other IP-related matter, the Vonage Order leaves the threshold

¹⁶ ICC Order at ¶790 ("We now conclude that a uniform, national framework for the transition of intercarrier compensation to bill-and-keep, with an accompanying federal recovery mechanism, best advances our policy goals of accelerating the migration to all IP networks, facilitating IP-to-IP interconnection, and promoting deployment of new broadband networks by providing certainty and predictability to carriers and investors").

¹⁷ Fact Sheet at 1.

¹⁸ Vonage Holdings Corporation Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utils. Comm'n, Memorandum Opinion and Order, 19 FCC Rcd 22404, 22404, ¶1 (2004) (hereinafter "Vonage Order"), aff'd sub nom. Minn. Pub. Utils. Comm'n v. FCC, 483 F.3d 570 (8th Cir. 2007).

¹⁹ NPRM at ¶99.

²⁰ 47 U.S.C 253(b).

matter open for too much debate, uncertainty, and potential for delay and years of needless litigation.

As stated in the NPRM, quoting the National Emergency Number Association (“NENA”) Handbook guide, “it is critical that state regulatory bodies and *the FCC* take timely and carefully scrutinized action to analyze and update existing 9-1-1, PSTN, and IP rules and regulations”²¹ (Emphasis added). Noting an earlier request, the Commission also stated in the NPRM that “[t]he Texas 9-1-1 Agencies request that the Commission address interconnection disputes and the registration and certification of NG11 SSPs.”²² The NENA Handbook and the earlier Texas comments recognize and seek critical guidance from the Commission on these types of issues in the context of the federal-state regulatory framework, which are matters within the Commission’s area of expertise and responsibility and which are a critical element of NG9-1-1 transition.

As noted above, in the NPRM the Commission seeks comment on whether “as a precondition to Commission action, states should be required to demonstrate that they have adopted appropriate or removed outmoded legal or regulatory measures to facilitate NG911 deployment”²³ The Commission also seeks comment on what regulatory or statutory changes, if any, “would be necessary for the Commission ... to facilitate and oversee the deployment of NG911 networks.”²⁴ But the Commission should be asking these questions in the reverse order, after the Commission itself first clarifies what it views as permissible and good faith actions by states and other governing entities regarding the transition to NG9-1-1 systems.

²¹ NPRM at ¶16.

²² NPRM at ¶97.

²³ NPRM at ¶99.

²⁴ NPRM at ¶100.

States and regions cannot reasonably and fairly be expected to “adopt or remove” regulatory measures associated with the transition from E9-1-1 to NG9-1-1 systems if, as some providers continually assert in regulatory and legal venues, the Commission has pre-empted states and other governing entities on *all* IP-related matters -- which may include IP NG9-1-1 systems. State public utility commissions or 9-1-1 authorities cannot proceed to require providers of NG9-1-1 systems to obtain state certification or authorization as a precondition if such is prohibited and pre-empted by the Vonage Order or other Commission IP proceedings. State public utility commissions or 9-1-1 authorities cannot proceed to arbitrate interconnection disputes associated with wholesale and retail points of interconnection (“POIs”) involving NG9-1-1 systems and/or IP-interconnection if such is prohibited and pre-empted by the Vonage Order or other Commission IP-related proceedings. Moreover, the ongoing accelerating telecommunications to IP market and proposed sunset dates for the PSTN may change the circumstances of PSAPs dramatically and quickly if carriers upgrade their 9-1-1 networks to IP as part of the PSTN sunset, or if the competitive IP market results in the unavailability of non-IP networks for 9-1-1 service delivery.²⁵

The Commission must provide some degree of greater clarity on the federal-state regulatory framework before states can demonstrate that they have adopted appropriate or removed outmoded legal or regulatory measures to facilitate NG911 deployment. The current federal and state cooperative approach to E9-1-1 regulation is known and well understood -- on

²⁵ A recent Ex Parte by Verizon which indicates that IP may become the only option before full transition to NG9-1-1 is a valid matter for concern: “Although IP-based networks open the door to innovative new products and services, companies cannot realize the efficiencies those networks promise if they are simultaneously required to expend resources to maintain backwards compatibility with the outdated legacy network. The aging legacy PSTN infrastructure is costly to maintain, and new IP-based networks should replace them, rather than supplement them.” Verizon Ex Parte in GN Docket 09-51 and CC Docket No. 01-92 (Dec. 7, 2011).

both the wholesale and retail level for E9-1-1. For purposes of availability associated with wholesale and retail interconnection for E9-1-1, there are currently wholesale interconnection issues with wireline, wireless, and VoIP carriers handled both by the Commission and state public utility commissions under the FTA96, the NET 9-1-1 Improvement Act, or under voluntary commercial agreements between carriers, and retail interconnection and certification 9-1-1 issues handled by state public utility commissions under FTA96 and the Section 253(b) public safety and welfare reservation to the states. But how these types of issues are to be addressed and dealt with in the context of NG9-1-1 remains unknown and unclear, although they have been raised and pending since at least 2010²⁶ and have also been noted by CSRIC.²⁷ Put

²⁶ See August 27, 2010 Ex Parte of Intrado, “*Next Generation 9-1-1 Cooperative Governance*” in GN Docket 09-51, 09-137; PS Docket 07-114; WC Dockets 04-36, 05-196; CC Docket 94-102 at pages 4-5, which provides: “guiding principles suggested below, which a state may elect to not follow, and should provide clarity with respect to oversight responsibility for states and PSAPs, including:

- State level: certification of 9-1-1 service providers, obligations of originating networks to deliver 9-1-1 traffic, end-to-end oversight of a Request For Assistance (RFA) 9-1-1 service quality standards, data accuracy, and call routing standards

- PSAP level: scope of planning activities, response to RFAs, choice of 9-1-1 service provider, reporting obligations, and the general management of call centers. ...

Logically, the promise of NextGen9-1-1 that all Americans are able to request emergency help irrespective of the technology or device employed to initiate or deliver such requests *demand a coherent legal/regulatory framework.*” (Footnotes in original omitted and emphasis added)

²⁷ See, CSRIC Working Group 4B, Transition to Next Generation 9-1-1, Final Report (March 2011) at 5.1.3.4, which provides:

5.1.3.4 Review of Regulatory and Legislative Issues

In the Governance and Policy section of A National Plan for Migrating to IP Enabled 9-1-1 Systems, the National 9-1-1 Program states that — As NG9-1-1 deployment begins, current roles and responsibilities among all entities involved in providing 9-1-1 services will change and the existing legal and regulatory environment will likely not effectively accommodate new technologies and arrangements. The deployment of NG9-1-1 will require increased coordination and partnerships among government and Public Safety stakeholders, 9-1-1 Authorities, service and equipment providers, and PSAP Administrators in planning and implementing NG9-1-1. A new infrastructure will require a new delineation of roles and responsibilities among the parties, defined by common practices and statutes. Coordination with the general public will also be important to address concerns and to manage expectations. As a result, legislative and

simply, it is critical for the Commission to provide a greater degree of certainty on the federal-state regulatory framework by making clear that states and regions may proceed in good faith with legal or regulatory measures *as long as they are acting consistent with the Commission's deployment goals for NG9-1-1 systems deployments and capabilities.*

The Texas 9-1-1 Alliance respectfully submits that the Commission should build on its recent efforts in the ICC Order and FNPRM on IP-to-IP interconnection and enable NG9-1-1 by clearly and affirmatively declaring that *as long as done in a manner consistent with the Commission's deployment goals for transition to NG9-1-1 systems deployments and capabilities,* the following three regulatory framework roles apply as general matters:

First, states and regions are not pre-empted, if they are seeking in good faith to implement or modify E9-1-1 regulations that address technical and operational policy, certification, quality and security for NG9-1-1 systems. As a matter of comity and sound public policy, there is simply no reason for states to spend resources and time seeking to change state laws and regulations that may be arguable barriers, if such can no longer be applicable in any manner to IP services. To do so would risk litigation and years of delay based on assertions of Commission pre-emption on IP issues.

Second, the declaration in paragraph 1011 of the ICC Order that "we expect all carriers to negotiate in good faith in response to requests for IP-to-IP interconnection"²⁸

regulatory arrangements and demarcation points at every level of government may need to be reexamined and some modified to effectively support NG9-1-1 deployment. The Funding Sub Group concurs that current roles of those responsible for 9-1-1 service in an area or region will change with NG9-1-1 and that new partners and stakeholders will be active participants in the planning and deployment of an effective NG9-1-1 system. (Footnotes from original omitted)

²⁸ ICC Order at ¶1011 ("In particular, even while our FNPRM is pending, we expect all carriers to negotiate in good faith in response to requests for IP-to-IP interconnection for the exchange of voice traffic"); see also FNPRM at ¶1335 and at ¶1341.

applies equally, if not more strongly, to good faith requests for carriers to connect to IP ESInets and NG9-1-1 systems. The availability of IP text and video can necessarily and simply be an adjunct to a *bona fide* good faith request to carriers for IP-to-IP connection via the ESInet and NG9-1-1 system. Addressing exceptions to the general good faith IP-to-IP interconnection principle on a case-by-case adjudicatory framework as proposed in the ICC and FNPRM may also be equally reasonable in the context of IP-to-IP connection via IP ESInets or NG9-1-1 systems.

Third, the same expectation to negotiate in good faith provided for in the ICC Order on IP-to-IP interconnection applies to states and regions requesting carriers to connect to NG9-1-1 systems. States, regions, and localities that cannot in good faith handle IP-to-IP connection via IP ESInets or NG9-1-1 systems should not be making requests for IP-to-IP interconnection when it can potentially divert scarce resources and funding from *bona fide* legitimate requests for connection to NG9-1-1 systems.

The Commission's clarification on these issues is a critical and essential prerequisite to whether "as a pre-condition to Commission action, states should be required to demonstrate that they have adopted appropriate or removed outmoded legal or regulatory measures to facilitate NG911 deployment"²⁹ If the Commission provides the affirmative clarifications requested above, then it would be fair and reasonable for the Commission to require a demonstration that states and regions have adopted or removed regulatory measures to facilitate the transition from E9-1-1 to NG9-1-1 systems to the extent permissible under such clarified federal-state regulatory framework.

²⁹ NPRM at ¶99.

C. Consumer Education and Disclosure Mechanisms

The Commission seeks comment on the role for the Commission and other government and private sector entities in public education efforts and quotes Motorola's earlier comments that that all governments (local, regional, state, and federal) and private sector entities need to be thinking about how to disseminate accurate information to the public. The Texas 9-1-1 Alliance concurs with Motorola. Ultimately, the communications industry, device manufacturers, states, regions, and localities, the Commission and other federal agencies must all be responsible and actively involved in education efforts and in making educational information widely available on websites and other media. These efforts should take place on a regular and continuing basis during the transition from the PSTN to a fully IP voice and multimedia and multi-device environment for requesting emergency assistance.

The Texas 9-1-1 Alliance appreciates the opportunity to comment on these extremely important issues.

Respectfully submitted,



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