

**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
)	

JOINT REQUEST FOR EXTENSION OF REPLY COMMENT DEADLINE

The National Emergency Numbering Association (“NENA”), the Association of Public-Safety Communications Officials (“APCO”), and CTIA – The Wireless Association® (“CTIA”) (collectively, the “Parties”) respectfully submit this joint request for a 30-day extension of the reply comment deadline in the above-captioned proceeding. Currently, reply comments are due January 10, 2012.¹ The Parties hereby request that the Federal Communications Commission (“FCC” or “Commission”) extend this deadline to February 9, 2012. As discussed below, the very recent release of two crucial reports and recommendations by the Emergency Access Advisory Committee (“EAAC”) and the ATIS Interim Non-Voice Emergency Services (“ATIS-INES”) Incubator require additional time for full evaluation and consideration. Given this, and given the intervening Holiday Season, a modest 30-day extension is in the public interest. An extension will allow commenters a meaningful period of time to review, analyze, solicit feedback from member organizations, and allow these new findings to inform their reply comment submissions.

¹ See *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, Framework for Next Generation 911 Deployment*, 76 Fed. Reg. 63,257 (Oct. 12, 2011); see also *Facilitating the Deployment of Text-to-911 and Other Next Generation Applications, Framework for Next Generation 911 Deployment*, Notice of Proposed Rulemaking, PS Docket No. 11-153, PS Docket No. 10-255, FCC Rcd. 13615 (2011) (*NPRM*).

On December 7, 2011 the EAAC submitted a report and a series of recommendations to the Commission, which was made public on December 12, 2011 through the Commission’s Next Generation 911 (“NG911”) proceeding.² The submission of the EAAC’s recommendations represents a significant milestone in the implementation of the Communications & Video Accessibility Act of 2010 (“CVAA”) and provides a plethora of policy, technical, and educational recommendations for achieving equal access to 9-1-1 emergency services by individuals with disabilities as part of the transition to NG911 services.³ As the Commission recognized in the Notice of Proposed Rulemaking (“*NPRM*”), “[t]here is considerable overlap between the NG911 text and multimedia capabilities discussed in this Notice and the NG911 accessibility issues being considered by the EAAC[.]”⁴ The *NPRM* also acknowledged the benefits of developing common solutions, rather than specialized services solely for persons with disabilities.⁵ Given the Commission’s acknowledgement of the EAAC’s significant input, and in order to produce a more developed record for the FCC to consider, it would be in the public interest to extend the deadline to allow interested stakeholders to fully consider and respond to the EAAC’s report and recommendations.

Similarly, the ATIS-INES Incubator’s findings, submitted on December 12, 2011, represent a substantial effort by the Public Safety community and wireless industry to recommend a short-term solution to enable text-based communications to 9-1-1 for persons with

² EAAC, Report and Recommendations, *available at* <http://fjallfoss.fcc.gov/ecfs/comment/view?id=6016877823>.

³ *Id.* at 19-38.

⁴ *NPRM* at ¶ 113.

⁵ *See Id.*

disabilities. The report analyzes potential interim solutions and examines their potential benefits and shortcomings in existing emergency communications policies and technologies.⁶ Indeed, the Commission sought comment on the findings of the ATIS-INES process and the Chairman specifically called for such in his statement on the *NPRM*.⁷ The requested extension will allow reply commenters to submit to the Commission comments that properly consider the findings of the ATIS-INES, as requested by the FCC.

Further, the current reply comment deadline also occurs around several significant holidays, including Christmas, Hanukkah, Kwanzaa, and New Year's Day. These are some of the busiest travel and vacation holidays, and many of the business and economic analysts, technical staff, and legal personnel that are responsible for evaluating the record and preparing reply comments will be unavailable during this time. An additional 30-day extension will ensure that all parties have the opportunity to allocate key resources to providing full input to the Commission in this proceeding.

The Parties recognize that the FCC does not routinely grant requests to extend filing deadlines.⁸ At the same time, the Commission has previously determined that extensions are warranted when the extension is necessary to ensure that the Commission receives full and informed responses and the affected parties have an opportunity to develop a more complete

⁶ See ATIS, ATIS Interim Non-Voice Emergency Services Report and Recommendations 8 (Dec. 12, 2011).

⁷ See *NPRM* at ¶ 78; see also *Statement of Chairman Julius Genachowski In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, Framework for Next Generation 911 Deployment*, PS Docket No. 11-153, PS Docket No. 10-255, 26 FCC Rcd 13615, 13688 (2011).

⁸ See 47 C.F.R. § 1.46(a).

record for the Commission’s considerations.⁹ Consistent with these precedents and as the Commission has previously requested comment on the issues raised in this request, a modest 30-day extension of the reply comment deadline is appropriate in this case. The extension will allow stakeholders a meaningful time to review, analyze, and comment on all of the comments in the record, including the significant submissions of the EAAC and the ATIS-INES Incubator.

For the foregoing reasons, the Parties jointly request that the FCC extend the reply comment deadline from January 10, 2012 to February 9, 2012. Granting this request will help

⁹ See, e.g., *Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges, Consumer Information and Disclosure, Truth-in-Billing and Billing Format*, CG Docket No. 11-166, CG Docket No. 09-158, CG Docket No. 98-170, Order at ¶ 3, DA 11-1860 (CGB Nov. 4, 2011); *Empowering Consumers to Avoid Bill Shock*, CG Docket No. 10-207, Order at ¶ 3, DA 10-2379 (CGB rel. Dec. 17, 2010) (recognizing that “the Commission has previously found that an extension of time is warranted when such an extension is necessary to ensure that the Commission receives full and informed responses and that affected parties have a meaningful opportunity to develop a complete record for the Commission’s consideration”); *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Order at ¶ 3, DA 10-2267 (PSHSB rel. Dec. 1, 2010) (granting an extension “to ensure that all interested parties have the time necessary to prepare full and informed comments and reply comments”); *Twenty-One Day Extension of Time to File Reply Comments on Wireless Innovation and Investment Notice of Inquiry*, Public Notice, 24 FCC Rcd 12579, 12579-80 (WTB and OET 2009) (finding that granting a limited extension serves the public interest because it “would be beneficial to the development of a complete record on the issues”); *Wireless Telecommunications Bureau Grants Extension of Time to File Reply Comments on Commercial Mobile Radio Services Market Competition*, Public Notice, 24 FCC Rcd 8490, 8490 (WTB 2009) (same); *Media Bureau Grants Extension of Time to File Comments and Reply Comments in Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, 23 FCC Rcd 3741, 3742 (MB 2008) (“we agree that an extension of the comment and reply comment period is warranted to enable commenters to adequately review, investigate, and comment on the specific issues raised in the *NPRM* and respond to the extensive comments filed in response thereto”); *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band, Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Order, 23 FCC Rcd 10527, 10528-29 (¶ 4) (WTB 2008); *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, Order, 20 FCC Rcd 19868, 19868-69 (¶ 3) (WTB 2005); *Elimination of Rate-of-Return Regulation of Incumbent Local Exchange Carriers, Federal-State Joint Board on Universal Service*, Order, 18 FCC Rcd 26307, 26307 (¶ 2) (WCB 2003).

ensure a thorough and meaningful record for the Commission and commenters to consider.

Respectfully submitted,

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