

Greg Rogers
Deputy General Counsel
Bandwidth.com, Inc.
4001 Weston Parkway
Cary, NC 27513
(919) 439-5399
grogers@bandwidth.com

Via ECFS

March 2, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: PS Docket Nos. 11-153 and 10-255 – Ex Parte Notice

Dear Ms. Dortch:

On Wednesday February 29, 2012 Bandwidth.com, Inc. met with commission staff and separately with Amy Levine, legal advisor to the Chairman and Sean Lev of the Office of General Counsel to discuss Bandwidth.com's proposal to provide a national clearinghouse function to enable text-to-911 solutions. In attendance for the meeting with Amy Levine and Sean Lev for Bandwidth.com were myself, John Murdock, President of Bandwidth.com, and Ray Paddock, Vice President of Emergency Services and VoIP Products. At the meeting with commission staff were myself, John Murdock, Ray Paddock, Kevin Breault, Vice President Sales, and Jason Shugart, Director of Engineering. Commission staff in attendance were David Furth, Henning Schulzrinne, Cheryl King, Patrick Donovan, Erika Olsen, Thomas Beers, Karen Peltz Strauss, John Healy, David Seihl, Aaron Garza, and Jerome Stanshine.

As discussed in Bandwidth.com's Reply Comments in the text-to-911 proceeding and in its Ex Parte notification filed on February 8, 2012, Bandwidth.com believes a key to enabling text-to-911 functionality is to establish a national clearinghouse. The clearinghouse would allow for states or other regional 911 entities to determine their preferred method of delivery for emergency texts to the PSAPs in their territories. This capability would provide the commission with far greater flexibility to ubiquitously implement text-to-911 because it does not necessitate choosing any one particular mode of delivery for emergency text messaging. Further, the national clearinghouse proposal of Bandwidth.com embraces the desire to advance next generation 911 ("NG911") network adoption across the country. Specifically the implementation of a national clearinghouse text-to-911 function would allow for text-to-TTY, text-to-relay, or real-time-text (RTT) until such time as all emergency texts might be delivered in a NG911 environment in all instances.

The presentation materials reviewed in the February 29, 2012 meetings is also being filed. Pages 19-28 of the presentation have been redacted to protect information from public inspection that is related to Bandwidth.com's pricing estimates for the national clearinghouse function on the basis that it is highly sensitive competitive commercial and financial information pursuant to 47 C.F.R Sections .0457 and .459. Bandwidth.com submitted the materials at the request of the commission to provide a perspective on the estimate of the cost such a national clearinghouse would be. There are other competitive providers that may also pursue the national clearinghouse proposal concept as a component of the text-to-911 function considered in PS Docket No. 11-153 and disclosure of the confidential information to such providers would put Bandwidth.com at a direct competitive disadvantage. A hard copy of an un-redacted version will be filed with the Commission as well according to the requirement of 47 C.F.R. Section .459.

This ex parte notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. Section 1.1206.

Sincerely,

/s/ Greg Rogers

Greg Rogers
Bandwidth.com, Inc.

Cc via e-mail: Amy Levine
Sean Lev
David Furth
Patrick Donovan
Henning Schulzrinne
David Siehl
Erika Olsen
John Healy
Aaron Garza
Cheryl King
Karen Peltz Strauss
Jerome Stanshine
Thomas Beers#