

March 23, 2012

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW0  
Washington, DC 20554

Re: *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.

Dear Ms. Dortch:

On March 21, 2012, Mike Maddix of Sorenson Communications, Inc. (“Sorenson”) and Renee Wentzel of Wiltshire & Grannis LLP, on behalf of Sorenson, met in person with Henning Schulzrinne, Federal Communications Commission (“FCC” or “Commission”) Chief Technology Officer; Karen Peltz Strauss of the Consumer and Governmental Affairs Bureau; and Patrick Donovan and David Siehl of the Public Safety and Homeland Security Bureau; and by phone with Cheryl King of the Consumer and Governmental Affairs Bureau and Jerome Stanshine of the Public Safety and Homeland Security Bureau.

During the meeting, we discussed Sorenson’s experience as a provider of Telecommunications Relay Service (“TRS”), including Video Relay Service (“VRS”), IP Relay, and IP Captioned Telephone Service (“IP CTS”), in light of the Commission’s consideration of interim and long-term text-to-911 solutions. Sorenson noted that it takes its 911 obligations very seriously, and that it has developed robust capabilities and procedures to provide effective relay services for emergency calls.

Sorenson recommended that the Commission focus on text-to-911 solutions that would be available to the general public, and not just to the deaf and hard-of-hearing population. We also discussed the use of relay centers for text-to-911 calls prior to full implementation of Next Generation 911 (“NG 911”), and Sorenson cautioned against the use of a centralized relay center. Sorenson also explained that the vast majority of IP Relay users prefer to use off-the-shelf applications to make IP Relay calls. We also discussed the various processes and services available to accurately identify and transmit the locations of 911 callers to the appropriate Public Safety Answering Points (“PSAPs”). Finally, we discussed the limitations of SMS with respect to latency and non-guaranteed delivery, which make it a nonviable text-to-911 solution in the absence of additional enabling technologies.

Sorenson also believes that any additional methods to contact 911 must not replace legacy methods, including relay services.

Please contact me if you have any questions.

Sincerely,

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/s/

Renee R. Wentzel  
*Counsel to Sorenson Communications, Inc.*

cc: Henning Schulzrinne  
Karen Peltz Strauss  
Patrick Donovan  
David Siehl  
Cheryl King  
Jerome Stanshine