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April 17, 2012

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VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
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 April 13, 2012, in connection with the above-referenced proceedings, Katie Peters and Bill Alberth with Motorola Mobility, Inc. ("Motorola") and the undersigned of Wiley Rein LLP, counsel to Motorola, met with Henning Schulzrinne, Chief Technology Officer, David Furth, Deputy Chief, Public Safety and Homeland Security Bureau, and Patrick Donovan, Attorney Advisor, Policy Division, Public Safety and Homeland Security Bureau.

During this meeting, we discussed the deployment of text to 911 functionality. Motorola expressed its concerns regarding the reliability of SMS in 911 situations and the technical challenges in implementing this capability from the perspective of a mobile device manufacturer. We also discussed that SMS is a best efforts system without guaranteed delivery, which makes SMS a poor vehicle for critical messages.

We responded to questions from Staff about whether Motorola's mobile devices sold in the United States are technically capable of supporting three-digit SMS short codes and whether the company could implement a software update that would enable these devices to use the 911 short code. As we explained to Staff, Motorola has released well in excess of 100 mobile device and software combinations in the U.S. market within the past three years, none of which has been tested for support of 911 as a SMS short code. As a result, with the installed base of Motorola devices, end users' experiences in trying to use 911 as an SMS short code may be seriously lacking. Motorola cannot predict or guarantee that this functionality would work consistent with end users' expectations.

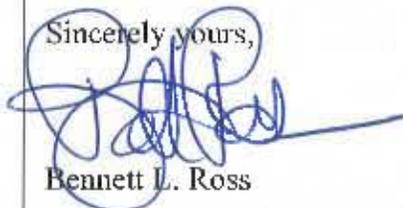
Marlene H. Dortch
April 17, 2012
Page 2

In response to questions from Staff, we also discussed testing alternatives in connection with the use of 911 as an SMS short code, including testing of some subset of mobile devices and the possibility of a third party establishing a test bed to facilitate testing by manufacturers and carriers. As explained by Staff, the purpose of such testing would be to confirm whether the SMSc (the switch handling the SMS message traffic) received the text message sent to a 911 short code from a particular mobile device, and not whether the text was successfully received by a Public Safety Answering Point ("PSAP"). Motorola indicated that limited text to 911 testing would be feasible for existing models that currently are being sold in the market, either as part of an upcoming maintenance release or in connection with the establishment of a third-party test bed. However, testing of the embedded base of mobile devices is not feasible. We agreed to provide Staff with additional information regarding the timing and cost involved in conducting testing of Motorola devices under various scenarios.

Finally, because of the latency issues associated with SMS, we also discussed notice to end users that an emergency message had actually been delivered. We explained that currently SMS delivery failures are silent, and thus most end users would not know when a text to 911 either did not go through or was delayed in the network. We also discussed the desirability of a standardized process by which end users utilizing text to 911 functionality would receive immediate feedback from the PSAP that their text message had been received.

Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced dockets.

Sincerely yours,



Bennett L. Ross

cc: Henning Schulzrinne
David Furth
Patrick Donovan