June 2, 2012

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


Dear Ms. Dortch:

At the request of the Commissions’ Public Safety and Homeland Security Bureau and pursuant to a telephone conversation with David Siehl, Attorney Advisor with the Policy and Licensing Division of the Public Safety and Homeland Security Bureau, the Durham Emergency Communications Center located in Durham, NC offers these comments.

Durham began a pilot program to test the ability to receive 9-1-1 texting directly to a 9-1-1 dispatching console on August 1, 2011. The program was a combined effort involving Intrado Inc. and Verizon Wireless. This program is ongoing and the emergency communications center tests the system twice daily to ensure it is working properly. There has been no issue with this technology and we are able to receive the telephone number of the person texting us with the location of the cellular tower it is being received from. Intrado provides a method of documenting every text received with a written time stamped transcript of all the information received and sent.

Durham is home to Duke University and North Carolina Central University as well as the Research Triangle Park (RTP) that contains several highly technical businesses. The population of Durham both City and County is approximately 268,000. During the program we issues several press releases, conducted media interviews, targeted specifically the younger population at our universities, and post regularly on the City of Durham’s Facebook page and Twitter accounts about the ability to text 9-1-1 through Verizon Wireless so that the public remains aware of this capability in Durham.

The concern that 9-1-1 texting could overwhelm an emergency communication center is not substantiated. To date we have received only one (1) 9-1-1 text requesting service and it was not an immediate emergency. It is evident that the public will not text 9-1-1 for any occurrence requiring immediate action. Our public education campaign stressed that texting to 9-1-1 should only be used when verbal communication could put the caller in danger, if you are deaf or hearing impaired or if you are in an area where the signal-strength is very low. We emphasized
also that the Public should not use traditional “text-speak” terms and to state exactly what is being requested. Our personnel were not trained in text language and are required to clarify any abbreviations that may be received. This has not been an issue or concern.

Another concern is that someone could deluge the center with false messages or keep sending messages that is incomprehensible. This occurred one time in Durham where someone sent us numerous text messages that indicated they did not need assistance. We were able to track the address of the person by the telephone number that came with the text messages through coordination with Intrado Inc. and Verizon Wireless. Law enforcement was sent to the address and there were no more issues.

Although numerous reports state the more texts are sent than voice calls, this does not correlate to meaning that the same will occur in an emergency communication center. It is however a valuable asset to any emergency communications center capabilities for those rare incidents and every 9-1-1 center should have it. The concerns of needing more staff or receiving numerous false messages are not substantiated.

Respectfully submitted,

James T. Soukup
Emergency Communications Director City/County of Durham, NC

Cc: Public Safety and Homeland Security Bureau:
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    David Siehl
    Aaron Garza