



State of Vermont
Enhanced 9-1-1 Board
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August 27, 2012

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

Re: Notice of Ex Parte Presentation - Facilitating the Deployment of Text-to-911 and Other Next Generation Applications, PS Docket No. 11-153 and Framework for Next Generation 911 Deployment, PS Docket No. 10-255

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 Vermont Enhanced 9-1-1 Board offers the following comments.

Vermont began a trial of text-to-911 technologies with Verizon Wireless and Intrado, Inc. earlier this year. Any subscriber to the Verizon Wireless network is currently enabled to reach our Williston Public Safety Answering Point (PSAP) provided the text message first hits a cell tower physically located in Vermont. We went through a period of extensive testing, including drive tests and later test texts placed by individuals from the deaf and hard of hearing community, to demonstrate that the system would work as designed. Text messages that hit a cell tower outside of the borders of Vermont receive a response message telling them that text-to-911 is not available. We worked with the deaf and hard of hearing community to prepare for this trial, including soliciting their assistance in publicizing the trial once started.

We set up this trial at only one of our eight PSAPs because we did not know what to expect. You are of course aware that there are a lot of concerns in the PSAP community about text-to-911, including that introduction of text-to-911 will overwhelm the PSAPs. While we don't have enough data to speak for the PSAP community as a whole, at least in Vermont, that fear seems overblown.

Most of the messages received have been test texts placed by individuals involved with managing the technology, including staff members of the Enhanced 9-1-1 Board. One message was deemed not to be an emergency (though it did involve an alleged crime), the individual was able to place a voice call and did so upon request. There has been one instance where the individual was clearly faking an emergency, and a handful of texts that we have deemed to have

come from individuals who read the press stories and just wanted to see if the story was true. When those individuals received a response from the PSAP to their text, they ceased communication. To put these types of text messages into context, Vermont recently charged an individual with placing seventy five (75) "fake" emergency voice calls, the point being that in our view there is nothing about this new technology that is any more likely to result in "spoof" contacts than what we already deal with on the voice side of the system.

To date, we have received two emergency texts. In the first case, we were able to intervene in a situation where an individual was in the process of committing suicide, and saved that person's life. The other emergency text came from an individual who was being physically abused by their spouse, and as a result an arrest was made.

While we would all like to have location information, even with SMS text we are at least able to identify those who send texts on mobile devices that also include phone service. We used the phone number in the case of the above mentioned suicide attempt to verify that we had the correct location of the individual (one of two text messages received during that session had provided a street address) before sending a responder. (In the case where someone was spoofing us, we were able to call that phone number and have a discussion with the subscriber about the seriousness of misusing the system and received no more texts from that device.) The longer session with the domestic violence victim provided enough opportunity to locate the individual so we could send help. Of course, in the end, it is still about the good work done by our call takers in Vermont. The underlying technology provided a means to an end in both emergencies that we might not have reached without the perseverance of the call taker on duty when those messages were sent.

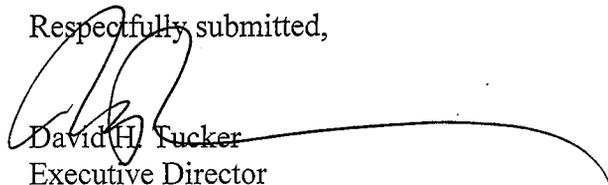
The text-to-911 solution is integrated into the Intrado call handling system, and appears much like the TTY component of the system, so the time to train the call takers was minimal. We have not experienced any problems with "kids" using text slang. We remain convinced that those who can make a voice call will make a voice call as that is still the most efficient way to communicate in an emergency. Those who can't make a voice call should have the same right to interact directly with our emergency system, and finally there is a means for those individuals to do so.

I've listened to the arguments of many good and honest brokers who express a preference for a better text solution to be made available before the 911 system moves to text-to-911. The individual whose life we saved and the domestic assault victim would likely disagree that it is too soon to have this technology available. We liken this emerging technology to the time before there was Automatic Location Information available. I expect that the 911 system is always going to be challenged by emerging technologies, but most of the perceived challenges with SMS text to 911 seem as related to funding concerns as anything else.

Our experience is limited but all indications are that even when we get to the point of having multiple carriers sending text to 9-1-1 messages, the volume should not be so great as to create significant issues. We are still working through the trial period, but we expect to be able to keep the Verizon system in place after the trial, and welcome other carriers to set up their own trial in our state.

Vermont hopes that the FCC will take affirmative action that will help speed delivery of SMS text-to-911, even with the known limitations of that technology. Making the perfect the enemy of the good, at least in this instance, is not the best approach. We have proven that SMS text-to-911 can save lives, and in the end, that's what is most important.

Respectfully submitted,



David H. Tucker
Executive Director
State of Vermont
Enhanced 9-1-1 Board

Cc: Enhanced 9-1-1 Board