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September 21, 2012

Via Electronic Submission
Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: ***Ex Parte Communication*** *-- 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:

This letter is to inform you that on September 19, 2012, Charles McKee, Vice President of Government Affairs for Sprint Nextel Corporation, spoke by phone with David Turetsky, Chief of the Public Safety and Homeland Security Bureau, and separately with Charles Mathias, Special Counsel to the Chairman, regarding the above referenced dockets.

Sprint emphasized the need to proceed cautiously in this area given the substantial limitations that will be inherent in any Text-to-911 service. As Sprint noted in its Comments and Reply Comments in the above-referenced proceedings, there are many technical and practical issues to be resolved before Text-to-911 can be implemented and it remains unclear how quickly such a system can be implemented on a national basis.[1] Sprint is exploring and evaluating the different technological approaches and is planning for participation in limited trials with Public Safety Answering Points and various vendors to test these systems, but standards have not yet been developed and practical issues of interoperability must be addressed.

Even if Text-to-911 is eventually implemented, it will remain a "best efforts" service with substantial limitations. Among other things, location information is not expected to be available with the same level of specificity as voice calls. Text messages can be delayed for substantial periods of time, may be presented or received out of order or delivery may fail altogether. For these reasons it is critically important that consumer expectations for this service be properly set and that potential limitations of the service be expressly noted in any item adopted by the FCC. Finally, Sprint urged the Commission to carefully consider the practical implications for the Public Safety Answering Points that will receive these messages.

As noted in its Comments and Reply Comments, Sprint does not oppose the development of this capability and is working to test how such implementation could be accomplished. Given the limitations of the service, however, which was never intended for such wide scale, routine use and certainly not for emergency purposes, we urge the Commission to proceed cautiously. Even with the best of intentions, substantial unintended consequences are possible in this sensitive area of public safety.

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[1] *See* Comments of Sprint Nextel Corporation, PS Docket Nos. 10-255 and 11-153 (Dec. 12, 2011); Reply Comments of Sprint Nextel Corporation, PS Docket Nos. 10-255 and 11-153 (Feb. 9, 2012).

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Sincerely,

/s/ Charles W. McKee

Charles W. McKee

cc: David Turetsky
Charles Mathias