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VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: NOTICE OF EX-PARTE COMMUNICATION

In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153; and In the Matter of Framework for Next Generation 911 Deployment, PS Docket No. 10-255.

Dear Ms. Dortch:

On September 20, 2012, Bob Quinn and I (both of AT&T) met with Charles Mathias, Special Counsel to Chairman Genachowski. The purpose of the meeting was to discuss AT&T's concerns regarding the Commission's proposed actions in the above-referenced proceedings.

Specifically, we expressed our concerns that an FCC Order that failed to include specific mandates and timeframes would result in significant customer confusion regarding the availability of Text-to-911 services. While open-ended mandates or broad policy statements may be useful on occasion, they would be particularly confusing to consumers in this context as they could be misunderstood to mean that Text-to-911 services will be universally available coincident with the order. And the consequences for confusion are particularly dire because 911 services, quite literally, often involve matters of life and death. Because the risks to public safety clearly outweigh the benefits of adopting a Text-to-911 order that is not yet ready for prime-time, the FCC should instead adopt a Further Notice of Proposed Rulemaking in order to resolve the various pending issues such as interoperability, deployment deadlines, and consumer education.

In addition, we raised concerns about limiting the applicability of Text-to-911 services to SMS services provided by telecommunications carriers. Given the prevalence of competitive alternatives to SMS, an order limited to SMS would certainly add to customer confusion. Therefore, the FCC must adopt a technologically neutral mandate that also applies to these competitive alternatives as well.



In accordance with the Commission's rules, this letter is being filed electronically in the above referenced dockets via the FCC's Electronic Comments Filing System.

Should you have any questions regarding the above or the attached, please feel free to contact me directly.

Sincerely,

/s/ Joseph P. Marx
Assistant Vice President, AT&T Services Inc.

cc: (via e-mail)
Charles Mathias