

**Kim Robert Scovill, Esq.**  
**Sr. Director**  
**Legal, Government, and Regulatory Affairs**  
Phone: 410.295-1884  
Fax: 410.295-1884  
Email: kscovill@telecomsys.com

October 9, 2012

**VIA ELECTRONIC FILING**

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

Re: Notice of *Ex Parte* Filing – Petition of  
TeleCommunication Systems, Inc. for Waiver of Part  
52 of the Commission's Rules, CC Docket No. 99-200

Dear Ms. Dortch:

To refresh the record, TeleCommunication Systems, Inc. (TCS) is submitting its current status for the Commission's consideration in this matter:

- 1) This Petition was originally filed on February 20, 2007 seeking a very narrow waiver of the portion of Part 52 of the Commission's rules that deal with the qualification for allocation of pseudo-Automatic Number Identification resources (p-ANI) used in the routing of 911 emergency calls.
- 2) On January 27, 2011, NEUSTAR, Inc., previously the temporary numbering authority, transitioned to responsibilities as the Permanent Numbering Authority (PNA). The new PNA guidelines for p-ANI assignments terminated the self-administration of p-ANI previously enjoyed by qualified organizations such as TCS. As such, TCS can no longer respond quickly to network p-ANI needs by self-assigning p-ANI from an administered pool and must make a new request for each new p-ANI required. This has resulted in immediate and continuing 911 routing issues that would be solved by the waiver relief requested under this Petition.
- 3) TCS has periodically updated / renewed this Petition, including a recent meeting on May 16, 2012 with Commission Staff detailing an urgent pANI issue in South Carolina. TCS, because it is not CLEC certified in South Carolina and there is not "central 911 authority" in South Carolina from which to secure a waiver, has been denied access to pANI in this area. This places TCS's customers, and their end users, in jeopardy. The Ex Parte filing associated with this meeting contains more information.
- 4) The pANI jeopardy situation previously described for the Commission continues with TCS's operations in South Carolina.
- 5) Granting TCS's waiver request will not violate any FCC rule, and TCS will follow all other rules and guidelines related to P-ANI services as part of its waiver request.

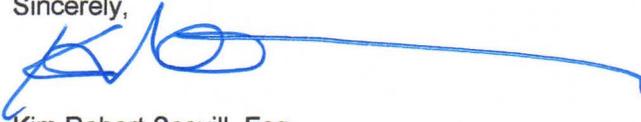
6) TCS's waiver request is supported by others in the emergency services industry. TCS is not aware of any party that would object to the waiver and believes that NEUSTAR, Inc. has no objection to this request.

TCS respectfully requests that the Commission grant the relief requested in this Petition under authority of the NET 911 Act of 2008 or the traditional waiver process.

Pursuant to the Commission's Rules, 47 C.F.R. Section 1.1206(b) (1), this letter is being filed electronically for inclusion in the record of the above-referenced proceeding.

Please do not hesitate to contact me if you have any questions regarding this submission.

Sincerely,

A handwritten signature in blue ink, appearing to read 'KRS', with a long horizontal flourish extending to the right.

Kim Robert Scovill, Esq.  
Senior Director  
TeleCommunication Systems, Inc.

cc: Marilyn Jones  
Sanford Williams  
Ann Stevens  
William Dever  
Travis Litman