



October 25, 2012

BY ECFS

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

*Re: **Ex Parte Notice**, WC Docket 05-196, PS Docket 10-255, PS Docket 11-153*

Dear Ms. Dortch:

On October 23, 2012 Paula Boyd, Laura Carter and Susan Chory of Microsoft spoke with Charles Mathias with the Chairman's Office and David Turetsky, David Furth and Patrick Donovan with the Public Safety and Homeland Security Bureau, and Henning Schulzrinne with the Office of Strategic Planning and Policy Analysis to discuss issues related to SMS-to-911.

Microsoft shared that the messaging application that ships on Windows Phone includes the ability to send an SMS and MMS message through the mobile operator infrastructure and to IM using Windows Live and some third party networks (e.g., Facebook) using a data connection. It is also possible for 3rd party applications to be installed on the phone that allow users to IM over different networks. Susan Chory, Senior Program Manager in the Windows Phone Group, described how consumers can access text offerings through the messaging application that comes with the phone or through the phone's contact list which is commonly referred to as our "people hub." Susan noted that neither the phone's operating system nor any Microsoft applications shipping on Windows Phone blocks the user's ability to send an SMS-to-911. Susan noted that the Windows Phone operating system automatically identifies when a short message includes content (such as a photo or other media) and sends those messages as an MMS rather than an SMS.

Susan also discussed other issues related to SMS-to-911 offerings including multi-segment concatenation, prioritization of 911 calls and text relative to other operations (e.g. Emergency Alerts on the phone) and accommodating two way SMS-to-911 communications. As the FCC adopts policies, Susan highlighted that the FCC should be sensitive to the reality that companies ship phones into numerous countries and will need to comply with multiple requirements.

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Please direct any questions to the undersigned.

Respectfully submitted,

/s/

Paula Boyd
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Cc: Charles Mathias
David Turetsky
David Furth
Patrick Donovan
Henning Schulzrinne