

Texas 9-1-1 Alliance

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November 1, 2012

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

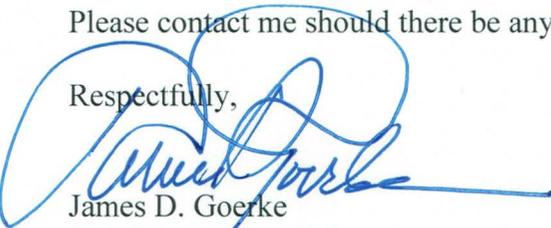
RE: PS Dockets 11-153 and 10-255, Ex Parte of the Texas 9-1-1 Alliance

Dear Ms. Dortch:

In initial comments in the above-referenced matters, the Texas 9-1-1 Alliance supported “the Commission’s tentative conclusion in paragraph 54 of the NPRM for PSAPs, providers, and vendors to continue having ‘the option’ to implement short-term alternatives under appropriate circumstances on a voluntary agreed basis.”¹ Consistent with the Texas 9-1-1 Alliance’s prior agreement with the Commission’s tentative conclusion on this point and as indicated by APCO International in its recent Ex Parte filing, it is important for the Commission to proceed by taking at least some initial steps now, such as the mandatory “bounce back” message because some carriers are deploying interim solutions now in advance of any future Commission deadlines in a later further notice of proposed rulemaking.² Also consistent with the Texas 9-1-1 Alliance’s initial and reply comments in the above-referenced matters, after the Commission takes such initial steps on texting-to-9-1-1, the Commission should forthrightly proceed to address the federal-state regulatory framework for NG9-1-1 services.³

Please contact me should there be any questions related to this matter.

Respectfully,


James D. Goerke
Chief Executive Officer

¹ Texas 9-1-1 Alliance Initial Comments, PS Docket Nos. 11-153 and 10-255 (Dec. 12, 2011), at p. 4.

² APCO International Ex Parte, PS Docket Nos. 11-153 and 10-25 (October 23, 2012), at p.1 (“[T]he Commission should adopt an order as soon as possible that includes a basic requirement that wireless carriers deliver 9-1-1 text messages to Public Safety Answering Points (PSAPs) that are ready and willing to accept such messages. The order should also require that there be a “bounce back” message informing the sender to make a 9-1-1 voice call when a text cannot be delivered to a PSAP. APCO International understands that compliance deadlines and other implementation rules related to the order will need to be considered in a further notice of proposed rulemaking”).

³ Texas 9-1-1 Alliance Initial Comments, PS Docket Nos. 11-153 and 10-255 (Dec. 12, 2011), at p. 2; Texas 9-1-1 Alliance Reply Comments, PS Docket Nos. 11-153 and 10-255 (Feb. 9, 2012), at p. 2 (“The Commission may have more than one permissible and coherent federal-state regulatory framework approach within its broad public safety and 9-1-1 authority. However, the critical point for prompt Commission attention remains the same: to put forth its preferred coherent federal-state regulatory framework for 9-1-1 IP, ESInets and NG9-1-1”).