

NENA

The 9-1-1 Association

1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

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

November 8th, 2011

RE:Docket No. 11-153, Facilitating the Deployment Texting to 9-1-1

Dear Ms. Dortch:

On Thursday, November 1st, 2012, and November 2nd, 2012, Brian Fontes and I made oral *ex parte* presentations concerning matters addressed in the above-captioned proceeding to the offices of Commissioners Pai and Rosenworcel, respectively. Commissioner Pai and Courtney Reinhard attend the first meeting on the part of the Commission, while David Goldman attended the second.

During these meetings, we expressed NENA's belief that the Commission must act quickly to establish a requirement that carriers support text messaging to 9-1-1, and provide "bounce-back" messages in areas where text-to-9-1-1 is not yet deployed. We noted, however, that NENA supports a flexible approach that defers issues such as a specific implementation timeline to a further notice of proposed rulemaking. Along the same lines, we noted that critical issues such as how PSAPs may elect to receive text messages should also be deferred to a further notice of proposed rulemaking. Finally, we expressed NENA's belief that non-carrier-supplied or "over-the-top" text messaging services should, ultimately, be subject to similar requirements. We cautioned, however, that although the current record supports immediate action on the aspects for which we expressed support, further study will be required to clearly establish the Commission's jurisdiction over and record support for a 9-1-1 requirement on over-the-top text messaging providers.

Please contact me, as below, if you have any questions concerning our presentations.

Sincerely,



Telford E. Forgety, III; "Trey"
Director of Government Affairs
& Regulatory Counsel

CC:

Commissioner Ajit Pai
Commissioner Jessica Rosenworcel
Ms. Courtney Reinhard