

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

November 9, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission **VIA ELECTRONIC FILING**
445 12th Street, S.W.
Washington, DC 20554

Re: **Notice of Oral Ex Parte Presentation- Supplemental**
 Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS
 Docket No. 11-153; Framework for Next Generation 911 Deployment, PS Docket No. 10-
 255

Dear Ms. Dortch:

On November 7, 2012, Tim Lorello, Kim Scovill, Don Mitchell, Robert Ehrlich, and Roderic Robinson of Telecommunication Systems (“TCS”) met with Commission staff to discuss matters relating to the above-referenced proceedings. Commission staff in attendance were; David Turetsky, Patrick Donovan, Karen Peltz Strauss, Cheryl King, Rochelle Cohen, Aaron Garza, and Dana Zelman.

In the process of discussing the above-referenced proceedings TCS responded to particular questions from the Commission. For continuity with its previous ex parte filing, this notice highlights those questions and provides the background regarding TCS’s responses. Both filings are being made in accordance with Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206.

1) **Question:** Estimate of when ATIS JSMS911 Standard for SMS to 9-1-1 will be finalized?

Response: The JSMS911 Working Group has set a goal that the first edition of the standard is set to go to ballot within the group in January 2013 with a goal of publication later in Q1 2013.

2) **Question;** What is the percentage of PSAPs with Internet access?

Response: Based on TCS’s interviews with PSAP personnel at NENA and APCO meetings, and on general information and belief, TCS responded that the percentage was relatively high, but that internal PSAP restrictions, for security reasons, may limit access by individual PSAP

operators. However, TCS has not been able to provide verification of an exact percentage within the deadline for the filing of this ex parte notice.

- 3) **Question:** During an emergency, disaster, or high call volume event, do long wait times or busy signals to voice callers result in SMS to 911 messages as a second contact method, in part, because SMS messages are likely to be received?

Response: TCS believes that providing SMS-to-911 capabilities will have benefits that go beyond supporting the deaf/hard-of-hearing communities and handling somewhat infrequent emergency scenarios in which the caller is unable or unwilling to communicate via a voice call. In situations in which a high 9-1-1 call volume results in blocked calls to the PSAP or situations in which the wireless infrastructure capacity is impacted such that placing voice calls is difficult or impossible, SMS communications to a PSAP may provide the only reasonable communications method to emergency services. Because of the nature of the solution TCS provides, a single "text-taker" station could receive multiple SMS conversations. These "text-taking" interfaces provide a PSAP "text-taker" the option of handling more than one emergency event by multi-tasking. Further, this would allow the PSAP to triage a larger number of inbound emergency scenarios and attempt to address the more urgent and life-threatening emergencies with greater priority. This changes the current "first-in, first-addressed" emergency management approach. PSAP policies may not allow current call takers to work more than one emergency event at a time. Thus, PSAP policies and "text-taking" training would need to be addressed, and the FCC should examine whether liability protections would need to be adjusted or enhanced to cover this new possibility.

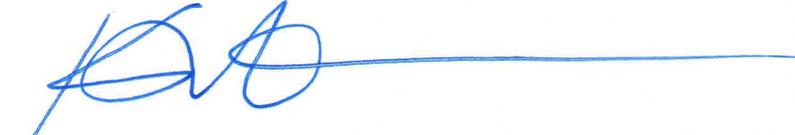
- 4) **Question:** Many "over the top" (OTT) messaging applications, while they do not "appear" to be text messaging, rely on underlying SMS technology to manage the messaging process. For example, the popular Apple iPhone has an Apple-specific messaging system. Do you know if such OTT systems rely on SMS to operate?

Response: In general, it is TCS's understanding that many OTT applications, while they communicate with other devices using the same application, do not disable the underlying SMS system on the device (if so equipped). For example, TCS cannot respond authoritatively for all versions of the Apple iPhone under all conditions or on all carriers, but initial reviews indicate that, in general, the iPhone currently uses SMS for text messaging management. However, this conclusion may not apply to Apple device-to-Apple device only messaging, should be confirmed with Apple, and may change in the future.

The live demonstration of TCS's beta SMS to 9-1-1 system included the current "bounce-back" message that senders would receive if the service was not available for any reason. The Commission suggested that the industry engage representatives of the deaf / hearing impaired community for refinement of that message.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please feel free to contact the undersigned if you have any questions.

Sincerely,



TELECOMMUNICATION SYSTEMS, INC.
Kim Robert Scovill

cc: David Furth
Patrick Donovan
Karen Peltz Strauss
Cheryl King
Rochelle Cohen
Aaron Garza
Dana Zelman
(via e-mail)