



CALIFORNIA TECHNOLOGY AGENCY

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Federal Communications Commission
Office of the Secretary

November 9, 2012

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

RE: NOTICE OF EX PARTE

In the Matter of "Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications", PS Docket No. 11-153; and "Framework for Next Generation 911 Deployment", PS Docket No. 10-255.

Dear Ms. Dortch:

On June 12, 2012, I, along with Karen Wong, Director of California's Public Safety Communications Office, and Ryan Dulin, Deputy Director of the California 9-1-1 Division, met with David Turetsky, Bureau Chief of the Public Safety and Homeland Security Bureau and Patrick Donovan, Attorney Advisor, Policy and Licensing Division, Public Safety and Homeland Security Bureau, to discuss our interest in pursuing a Text-to-911 initiative.

To that end, we respectfully request the Federal Communications Commission to:

- 1) adopt an order that includes a basic requirement for Wireless Service Providers to deliver 9-1-1 text messages to Public Safety Answering Points without delay that are ready and willing to accept such messages; and
- 2) keep the consistency of 9-1-1 as the input for text messaging services and that the order include the requirement Wireless Service Providers immediately notify the party texting 9-1-1 to make a voice call when a text message cannot be delivered.

The California Technology Agency is encouraged by the Federal Communications Commission PS Docket No. 11-153 responses to actively participate in deployments of Wireless Service Providers or applications providing Text-to-911. While there are only a few Text-to-911 trials by Wireless Service Providers underway in the nation, California continues to be cautious until several complexities are addressed, including prioritization in the emergency data session; authentication of the data user identification or device; obtaining location information quickly for accurate routing; validation of location to reduce spoofs; proactively monitoring harassing or potential repetitive spam; assignment of a unique identification key for tracking; and capability for the Public Safety Answering Points to obtain a data log of each session. As previously discussed in our original filing of December 12, 2011¹, the California

¹ Comments of the Public Safety Communications Office of the California Technology Agency, In the matter of "Facilitating the Deployment of Text-to-911", PS Docket No. 11-153, and "Framework for Next Generation 911 Deployment", PS Docket No. 10-255, <http://apps.fcc.gov/ecfs/document/view?id=7021750420> (December 12, 2011).

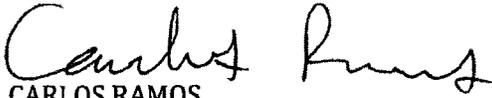
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Public Safety Communications Office recommends the development of a long-term, standards based solution for Text-to-911 to ease adoption and avoid interoperability issues between diverse systems.

The California Technology Agency understands that compliance deadlines and other implementation rules related to the order will need to be considered in a further notice of proposed rulemaking. However, deferring action on the basic requirements would only lead to uncertainty and delay serious consideration of implementation issues and requirements as the popularity of texting continues to grow as a primary form of communication among varying demographics.

With texting capability in the hands of millions of Californians, coupled with the options available for Wireless Service Providers within our existing infrastructure, we are ready and eager to work with you and all Wireless Service Providers to improve lifesaving emergency services for the people of California.

Respectfully submitted,



CARLOS RAMOS

Secretary, California Technology Agency

cc: Karen Wong, Director, Public Safety Communications Office
Ryan Dulin, Deputy Director, Public Safety Communications Office, CA 9-1-1 Division