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VIA ELECTRONIC FILING

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

Re: NOTICE OF EX-PARTE COMMUNICATION

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

Dear Ms. Dortch:

On November 26th and 27th, AT&T had a series of discussions with FCC Commissioner legal advisors regarding the above referenced dockets, as further described below.

On November 26, Bob Quinn, Joe Marx, and I met with Courtney Reinhard, Legal Advisor to Commissioner Pai. During this meeting, we reiterated AT&T's position that the FCC should not adopt an order that assigns a text-to-911 obligation merely to CMRS providers. AT&T believes that an obligation of this level of importance should be assigned on a technology neutral basis at the service level to all providers of text messaging services. We also explained how consumers may unwittingly send MMS messages instead of SMS messages (either by attaching a photo to an SMS message, or addressing an SMS message to multiple recipients) and how the failure to account for both types of messages when creating a "bounce-back" requirement could leave the customer in the dark as to whether their text message was received by a PSAP. The attached slide, also used in a previous meeting with Ms. Reinhard, was used during a discussion to describe the difference between the flow of an SMS message and the flow of an MMS message.

In addition, Bob Quinn spoke (via telephone) with David Goldman, Legal Advisor to Commissioner Rosenworcel, on November 26th and 27th. As above, and consistent with our meeting with Mr. Goldman last month, Mr. Quinn reiterated AT&T's position that the text-to-911 obligation should apply at the service level to all providers of text-messaging services.

Lastly, on November 27th, Joe Marx and I spoke (via telephone) with Mr. Goldman regarding the SMS/MMS issue described above.

In accordance with the Commission's rules, this letter and the attached presentation are being filed in the above-referenced dockets via the FCC's Electronic Comments Filing System.

Should you have any questions regarding the above or the attached, please feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. F." with a stylized flourish at the end.

Attachment

Cc: Ms. Courtney Reinhard (via e-mail)
Mr. David Goldman (via e-mail)

Simplified SMS Message Flow

Originating Service Provider

OTT Provider

Text Gateway Provider

PSAP Network

