



December 5, 2012

VIA Electronic Filing

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

Re: *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment*, PS Dockets No. 11-153 and 10-255

Dear Ms. Dortch:

On December 3, 2012, Kathleen Ham, Steve Sharkey and Shellie Blakeney, all of T-Mobile USA, Inc. (“T-Mobile”), spoke over the phone with Charles Mathias, Special Counsel to the Chairman, and David Turetsky, David Furth, Erika Olsen and Patrick Donovan, all of the Public Safety and Homeland Security Bureau, with respect to the above-referenced proceeding.

As previously stated in its filings in this docket,¹ T-Mobile appreciates the need for its customers to be able to contact 911 when they need to do so and recognizes the importance of a text-based messaging solution under certain circumstances. Interim text-based opportunities can, under certain circumstances, help address the emergency communications needs of wireless subscribers, notwithstanding limitations with this technology when used in the 911 context (*e.g.*, latency, per message character limits, lack of automatic location information, etc.).

T-Mobile believes that a voluntary approach to provision near-term text-to-911 service can provide a good solution. We expressed the importance of T-Mobile having flexibility to implement a solution in mid-2014 due to ongoing network modernization and LTE deployment occurring in 2013. Assuming a reasonable timeframe along these lines, T-Mobile should have sufficient time to carefully prepare the network to support a text-based 911 solution, while ensuring that any potential disruptions to the network – that would directly impact customers – are minimized.

In addition to timing for provisioning service, we discussed how the limitations of an SMS-based solution are directly tied to the coverage capabilities of service providers, and touched on the need to address third party text-based applications. T-

¹ See Letter of John T. Nakahata, Counsel to T-Mobile USA, Inc., to Marlene H. Dortch, Secretary, FCC, PS Dockets No. 11-153 and 10-255, at 1 (filed Sept. 25, 2012; Oct. 11, 2012).



Mobile does not have visibility into customer activity utilizing a third-party over-the-top application and carriers should not be held accountable for third-party text-to-911 activities.

We also discussed consumer outreach and education efforts with regard to texting to 911 and expressed support for continuing to work with the FCC and others on this important effort. To this end, we believe that “bounce-back” messaging which alerts customers attempting to text to 911 that they should instead dial 911 when text service is unavailable in an area is helpful for consumers; T-Mobile is supportive of this capability, and currently provides such messages.

Thank you for your consideration of this filing and please let us know if you have further questions.

Sincerely,

Kathleen O'Brien Ham

Kathleen O'Brien Ham
Vice President, Federal Regulatory Affairs

cc: Charles Mathias
David Turetsky
David Furth
Erika Olsen
Patrick Donovan