

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Framework for Next Generation 911
Deployment

PS Docket No. 10-255

Facilitating The Deployment Of Text-To-
911 And Other NG911 Applications

PS Docket No. 11-153

Legal And Statutory Framework For Next
Generation 9-1-1 Services Pursuant To The
Next Generation 9-1-1 Advancement Act
Of 2012

PS Docket No. 12-333

COMMENTS OF 4G AMERICAS

4G Americas is the leading industry association in the Americas representing the GSM family of technologies, including HSPA and LTE. In that role, 4G Americas and its members have long been working diligently toward the realization of NG9-1-1's benefits, studying NG9-1-1 solutions, and participating in various standards bodies. 4G Americas is pleased that its members and the Commission are moving forward to ensure the best possible implementation of NG9-1-1.

Most recently, on December 6, 2012, 4G Americas' leading U.S. carrier members joined with the Association of Public-Safety Communication Officials (APCO) and National Emergency Number Association (NENA) in announcing their participation in a nationwide, voluntary commitment to offer text-to-9-1-1 to their subscribers for delivery to authorized public-safety answering points (PSAPs) that are ready to receive texts in advance of full deployment of NG9-1-1. 4G Americas looks forward to reviewing the Further Notice of

Proposed Rulemaking adopted on December 12th, and to the contributions to the record in that proceeding.

4G Americas has also recently released a new technical report on the transition of the ecosystem to NG9-1-1, *Analysis of Transitioning to NG9-1-1 from a Wireless Service Provider Perspective* (“Report”), a copy of which is submitted with these comments. 4G Americas initiated this project to provide stakeholders a wireless service provider’s perspective on transitioning networks from today’s E9-1-1 voice services to NG9-1-1 voice and multimedia services. Wireless providers manage origination networks, 9-1-1 standards for which have been defined by both the Alliance for Telecommunications Industry Solutions (ATIS) and the industry’s standards-setting organization, Third Generation Partnership Project (3GPP). NENA and ATIS have defined multiple stages of architecture for a Next Generation E9-1-1 Emergency Services Network that includes advanced communication services support for emergency calls. To deliver NG9-1-1 for the user, the originating network must interconnect and interoperate with an IP-based emergency services network.

The Report places particular emphasis on the transitional period, during which carriers must accommodate both legacy E9-1-1 and NG9-1-1 networks. Long-term NG9-1-1 standards are still being developed. 3GPP has defined Internet Protocol Multimedia Subsystems (IMS)-based emergency calling for both voice and multimedia communications, but implementation of next-generation emergency services standards in origination networks is not expected to begin for three or four years. Multimedia Messaging Emergency Service (MMES) is an enhancement within the IMS emergency calling standard that will offer users enhanced functionality, such as the ability to dynamically add media during a call, real-time videos sessions with emergency services, and two-way communication with voice in one direction and text in the other.

However, even as NG9-1-1 starts to become available, it will be available only in certain service areas for a significant amount of time. Even those areas with early NG9-1-1 deployment may not have access to full multimedia services until a full transition is accomplished. As a result, migration and interworking strategies must be developed that will not only address the complexity of supporting legacy E9-1-1 and NG911 but will also ensure that consumers do not suffer any negative effects from the transition. These standards set the stage for NG9-1-1 and the applications that would be enabled with its fruition.

The Report complements this standards work by providing a first-ever wireless service provider perspective for transitioning from existing E9-1-1 services to the NG9-1-1 services and environment. The challenge for wireless service providers is significant, since there will be no “flash cut” in which all PSAPs transition at once to the new architecture and supporting systems. Rather, the transition to NG9-1-1 is almost certain to occur on an individual PSAP basis, requiring close coordination among the parties. During the extended transition period, significant transition planning will be needed, with full participation of all emergency services stakeholders (e.g., origination wireless network providers, public safety, network operators, system vendors, etc.).

The importance of a carefully developed transition plan cannot be overemphasized. At the time a consumer calls 9-1-1, the wireless origination network *must* know whether only legacy voice is supported at a given location or if that location supports NG9-1-1’s advanced communication services. In addition, wireless subscribers, unaware that there may be PSAP limitations in a given service area, may attempt to utilize advanced services in service areas where only legacy services are available. Because consumers will remain dependent on 9-1-1

emergency services throughout the transition period, the effects of the transition stages must effectively be conveyed to them.

4G Americas and its members are dedicated to the long-term success of NG9-1-1. The success depends on the dedication and involvement of all stakeholders in developing a realistic transition plan that will ensure continued availability of critical emergency communications for consumers while also recognizing the incremental nature of the migration to NG9-1-1.

Respectfully submitted,



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