

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 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 Next Generation 911 Applications

PS Docket No. 11-153

Comment on the Legal and Statutory
Framework for NG911 Services Pursuant to the
Next Generation 9-1-1 Advancement Act of
2012

PS Docket No. 12-333

REPLY COMMENTS OF AT&T INC.

The overwhelming majority of the parties that responded to the Bureau’s Public Notice seeking comments on the legal and statutory framework for Next Generation 9-1-1 (NG911) services¹ properly focused on issues germane to the task at hand; *i.e.*, helping the Commission meet its statutory duty of preparing a report to Congress on that topic. The one outlier is COMPTTEL, the trade association for certain competitive communications providers, which, pursuing its own self-serving agenda, chose to use this proceeding to advocate its position that “all carriers have an absolute right to interconnect with one another on an IP-to-IP basis pursuant to Section [sic] 251 and 252 of the Act.”² The Commission should not give any credence to COMPTTEL’s comments in this docket for two reasons. *First*, the legal issues surrounding IP-to-IP interconnection have been ably teed up for consideration by the Commission in its Further Notice of Proposed Rulemaking in its Intercarrier Compensation Docket,³ and are simply not pertinent to the Commission’s important work in this proceeding. *Second*, COMPTTEL’s

¹ Public Notice: Public Safety and Homeland Security Bureau Seeks Comment on the Legal and Statutory Framework for Next Generation 9-1-1 Services Pursuant to the Next Generation 9-1-1 Advancement Act of 2012, DA 12-1831 (rel. Nov. 13, 2012)(Notice).

² Comments of COMPTTEL, p. 6.

³ *Connect America Fund; etc.*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 10-90, 26 FCC Rcd 17663 (2011).

assertion that resolution of IP-to-IP interconnection is critical to “ensur[ing] that the customers of . . . competitive carriers will . . . have access to the next generation PSAPs and ESInets served by AT&T [or any other ILEC]” is simply erroneous.⁴

AT&T already has addressed the lack of merit in COMPTTEL’s legal position concerning IP-to-IP interconnection in the Intercarrier Compensation Proceeding, and will not burden the record here with a repetition of those arguments. Putting aside for the moment each party’s advocacy in that proceeding, the Bureau should recognize that, in its comments, COMPTTEL is conflating the concept of IP-to-IP interconnection among all providers of IP-based services with the ability of any individual IP-enabled provider to interconnect with a PSAP’s E911 System Service Provider (SSP). The fact is IP-enabled providers will not need to interconnect with every other IP-enabled provider in order to send NG911 traffic to the PSAP by way of the ESInet. IP-enabled providers will need only to interconnect with the SSP. And those entities acting as SSPs that refused to interconnect with duly authorized and standards-compliant providers seeking to send emergency communications to PSAPs would not long have their positions.⁵

Presumably COMPTTEL is fully aware that general IP-to-IP interconnection is not needed to permit IP-enabled providers to deliver emergency communications traffic to SSPs and, by extension, PSAPs. It follows, therefore, that COMPTTEL is only raising a baseless fear that it might be denied SSP interconnection with an AT&T operating company (or other similarly situated ILECs) as a way of advancing its advocacy in the Intercarrier Compensation Docket. Regardless, COMPTTEL’s comments are not applicable to these proceedings, and the Commission’s report to Congress need not address general IP-to-IP interconnection.

⁴ COMPTTEL, p. 5.

⁵ Today SSPs are typically ILECs. But this is not always the case. Increasingly, the SSP job is being assumed by other entities, such as INTRADO. Interconnection with the SSP is presently governed by tariff or contract.

AT&T Inc.

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