

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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

To: The Commission

**COMMENTS OF THE RURAL TELECOMMUNICATIONS GROUP, INC.**

The Rural Telecommunications Group, Inc. (“RTG”)<sup>1</sup> hereby files these comments in response to Section III.A of the Federal Communications Commission’s (“FCC” or “Commission”) *Further Notice of Proposed Rulemaking* regarding the deployment of text-to-911.<sup>2</sup> Section III.A seeks comment on a proposal to require commercial mobile radio service (“CMRS”) and other providers of text messaging services by June 13, 2013 to automatically notify consumers attempting to text-to-911 in areas where text-to-911 is not supported or in other instances where the text cannot be transmitted to the public safety answering point (“PSAP”). RTG is unaware of any of its members to date who anticipate difficulty in complying with the proposed bounceback requirement and RTG therefore does not oppose adoption of the proposed June 13 deadline. However, to the extent that carriers may face implementation difficulties in

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<sup>1</sup> RTG is a Section 501(c)(6) trade association dedicated to promoting wireless opportunities for rural telecommunications companies through advocacy and education. RTG’s members have joined together to speed delivery of new, efficient, and innovative communications technologies to the populations of remote and underserved sections of the country. RTG’s members are comprised of both independent wireless carriers and wireless carriers that are affiliated with rural telephone companies. Each of RTG’s members serves less than 100,000 subscribers.

<sup>2</sup> *In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment*, Further Notice of Proposed Rulemaking, PS Docket No. 11-153, PS Docket No. 10-255 (rel. Dec. 13, 2012) (“FNPRM”).

meeting the June 13 deadline, RTG notes that such carriers may elect to seek waiver relief. RTG also notes that it will be filing comments regarding the remainder of the FNPRM during the second phase of this proceeding.

Respectfully submitted,

**RURAL TELECOMMUNICATIONS GROUP, INC.**

By: */s/ Caressa D. Bennet*

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