

Before the Federal Communications Commission

PS Docket Nos. 11-153 / 10-255

IN RE

FACILITATING THE DEPLOYMENT OF TEXT-TO-9-1-1
AND OTHER NEXT GENERATION 9-1-1 APPLICATIONS

FRAMEWORK FOR NEXT GENERATION 9-1-1 DEPLOYMENT

ON FURTHER NOTICE OF PROPOSED RULEMAKING

REPLY COMMENTS OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION

The National Emergency Number Association (“NENA”) respectfully submits the following comments in reply to those filed by various parties in response to the *Further Notice of Proposed Rulemaking* released by the Commission on December 12th, 2012.

REPLY

This comment round is yet another among the recent proceedings at the Commission that have garnered a remarkable degree of consensus. As a result of this consensus, NENA wishes to present only three points in reply:

First, it is clear from the record that the deadline for implementation of bounce-back messaging by CMRS providers provided in the Carrier-NENA-APCO agreement is reasonable and achievable. Supportive comments by the Rural Telecommunications Group, Inc., and Proximiti Technologies, Inc., indicate a commendable willingness on the part of small and rural CMRS providers to act in the public interest.¹ With renewed confidence based upon these and other comments, NENA believes that, coupled with a tough but fair waiver regime, the June 30th, 2013 deadline can be implemented effectively.

Second, there remains considerable debate as to the appropriate and preferable means of informing consumers about the availability of text-to-9-1-1 service in a particular area. Despite some record support for testing capabilities,² NENA and others remain unconvinced that a consumer testing function can be implemented effectively and securely without either providing a false sense of security to the consumer or risking an avalanche of non-emergency texts reaching text-enabled PSAPs. NENA therefore urges the Commission to focus initially on educating consumers about what text-to-9-1-1 *is*, and *how it works*, rather than on *where it is available* or *whether it works in a given place*.³ Until a further record on these latter subjects is developed, NENA believes the balance of

¹ Proximiti Technologies, Inc. *Comments* at 1; Rural Telecommunications Group, Inc., *Comments* at 2. Accord TeleCommunications Systems, Inc., *Comments* at 4.

² Compare Fairfax County, Virginia, *Comments* at 3-4; Motorola Mobility, LLC, *Comments* at 4; and TeleCommunications Systems, Inc., *Comments* at 7 with APCO International, *Comments* at 3; Boulder Regional Emergency Telephone Service Authority, *Comments* at 16; NENA, *Comments* at 9-10.

³ Compare AT&T, Inc., *Comments* at 9; and NENA, *Comments* at 10-11 with Boulder Regional Emergency Telephone Service Authority, *Comments* at 14.

the comments favors further inquiry, rather than speedy action.

Third, NENA reiterates our contention that providers of interconnected text messaging services can and should provide bounce-back messages to users attempting to text 9-1-1, but cautions that the lack of *any* participation in this docket by such providers may indicate a need for further consideration of the unique technical considerations (and resulting timeframes) applicable to such applications.

CONCLUSION

The Commission should adopt a bounce-back messaging requirement for CMRS-provided text messaging services with a primary implementation deadline of June 30th, 2013.

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