

Title: Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment

Agency: Federal Communications Commission

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The prospect of an interim text-to-911 service holds promise for improving access to emergency services for those with disabilities and other individuals. Any regulations issued by the FCC implementing text-to-911 capabilities in emergency communication services should ensure that Public Safety Answering Point (PSAP) operators are trained not only in unique American Sign Language syntax and abbreviations, but also the new lingo and slang employed by the texting generation. This is needed to ensure effective communication and access to emergency services.

For those whose primary form of communication is American Sign Language, such training will be essential to achieving the purpose of the Twenty-First Century Communication Video Accessibility Act of providing “equal access to emergency by individuals with disabilities...”¹ Any text-to-911 service could also be required to train its employees in American Sign Language syntax and abbreviation in order comply with the direct, equal access provisions of the Americans with Disabilities Act.² The primary alternate method of accessing emergency services for persons with speech and hearing disabilities is by way of a teletypewriter (TTY). TTY allows for real-time text based communication with PSAP operators via a device attached to a phone. According to the Justice Department, equal access to 911 services for TTY under title II the Americans with Disabilities Act requires that a PSAP train its operators to effectively recognize and process TTY calls.³ This includes syntax, abbreviations and communication protocol, which differ for American Sign Language Users.

Similar to the differences in text communication employed by American Sign Language users, younger generations, raised with computer instant messaging and texting, use a host of acronyms difficult for older generations to comprehend.⁴ Thus, it will be imperative that PSAP operators are well versed in this shorthand if they are to effectively deliver services to younger generations. The possibility of misunderstandings and is amplified in a text-to-911 interaction, which is not, like voice or TTY, real-time. For one, the ability of the operator to ask questions for clarification and receive answers in a timely fashion is diminished in text message communication. As the NPRM acknowledges, text-to-911 services are not real time and thus could be delayed in delivery and receipt. On the other hand, if the PSAP operator misapprehends a text message because it uses commonplace younger generation slang or abbreviations, it could lead to the dispatch of incorrect emergency services or the delay of the correct ones.

¹ Twenty-First Century Communications And Video Accessibility Act, Pub. L. No. 111-260, October 8, 2010, 124 Stat 2751 (2010)

² Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. §§ 12101-12213 (2000)

³ Americans with Disabilities Act Access for 9-1-1 and Telephone Emergency Services, Department of Justice, Civil Rights Division, Disability Rights Section (July 15, 1998), <http://www.ada.gov/911ta.htm>.

⁴ See, e.g., Ann Pleshette Murphy And Laura Lacy, Cracking the Teen Texting Code, ABC Good Morning America (June 12, 2007), <http://abcnews.go.com/GMA/AmericanFamily/story?id=3269814&page=1#.Trmoa2BSbo>.