

**Before The
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Facilitating the Deployment of Text-to-911 and Other Next Generation Applications)	PS Docket 11-153
)	
Framework for Next Generation 9-1-1 Deployment)	PS Docket No. 10-255
)	

**COMMENTS OF
TELECOMMUNICATION SYSTEMS, INC.**

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SUMMARY

TCS supports a minimal formal regulatory framework as necessary to protect providers and participants, and ensure consistent universal text-to-911 service. Third party application developers deemed to provide text-to-911 service should promptly comply, absent a valid waiver request, with Commission directives regarding this service. CMRS carriers, and their vendors, should route messages based on cell sector location, but due to technical limitations, Phase II location rules should not apply to text-to-911 service. A centralized national PSAP database for routing of text-to-911 messages is unnecessary and contrary to developing standards. Text-to-911 delivery as a TTY message is a decision for the local PSAP. Carriers and their vendors should not be required to comply with non-standard architectures. If implemented according to proposed industry standards, text-to-911 should not be susceptible to spoofing. Liability protection is essential for text-to-911 and all future NG911 services. As detailed in TCS's previous filings, the Commission has an historic opportunity to correct looming intellectual property concerns that will derail all of the Commission's NG911 goals if not addressed.

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**COMMENTS
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TELECOMMUNICATION SYSTEMS, INC.**

TeleCommunication Systems, Inc. ("TCS") hereby submits its second set of comments in response to the Further Notice of Proposed Rulemaking ("Notice") released by the Federal Communications Commission ("Commission" or "FCC") in the above-referenced proceedings.¹

I. Minimal Regulatory Framework

A. TCS Support A Minimal Formal Regulatory Framework As Necessary To Protect Providers And Participants And Ensure Consistent Universal Text-to-911 Service

As noted in its earlier comments to Part III. A in this proceeding, TCS supports the voluntary commitments of industry in collaboration with public safety to achieve the earliest viable launch of text-to-911 services. However, TCS also expressed reservation that important

¹ Further Notice of Proposed Rulemaking, *Facilitating the Deployment of Text-to-911 and Other Next Generation Applications*, PS Docket 11-153; *In the Matter of Framework for Next Generation 9-1-1 Deployment*, PS Docket No. 10-255 (Released December 13, 2012)(FCC 12-149) ("Notice"). The Commission requested Comments to Section III. A in advance of comments to the remaining sections. TCS filed its initial Comments on January 29, 2013, and incorporates by reference that filing herein.

dimensions of this commitment, such as liability protection for carriers, vendors, and first responders, and universal availability of services, may be unavailable or compromised without a formal Commission regulatory framework. Unless and until those doubts are addressed, and for all the other reasons noted by the Commission, TCS reluctantly can find no sufficient alternative to a minimal FCC mandatory framework and timetable (with the caveat that the Commission must develop an expedited waiver process for both the framework and the timetable).

B. Application Developers Deemed To Provide Text-to-911 Service Should Promptly Comply

TCS's response is also detailed in other questions and/or its previous response in this docket. In its experience, third-party message providers who are otherwise providing an equivalent to SMS services should comply with the Commission's rules for text-to-911 services (with the caveat that a waiver process exist to accommodate special circumstances).

On this point, TCS would also caution awareness of technical arbitrage regarding compliance with the Commission's proposals. Application developers and over-the-top (OTT) providers may parse the Commission's rules in such a way as to avoid scrutiny. For example, as has been seen in the VoIP arena, OTT services may be artificially modified as "one-way" or lacking other features so as to side-step the Commission's rules. With an expedited waiver process in place, application developers and other SMS-like providers who have legitimate technical, financial, or other relevant barriers to compliance can make their concerns known to the Commission and receive relief. While CMRS carriers are in voluntary or mandatory compliance, such OTT providers should not be free to "self-define" their regulatory status by artificial technical subterfuge.

C. CMRS Providers, And Their Vendors, Should Route Messages Based On Cell Sector Location

Because text messaging is fundamentally a “best efforts” system and was not designed with inherent location capabilities, assuming direct parallels to the current emergency call routing and location paradigms for voice 9-1-1 calls is not appropriate for text-to-911 location services. Different network topologies and location handling techniques and technologies negate the potential for a “one-size-fits-all” solution for text-to-911 location information delivery. Coarse location information (e.g., cell site location) can be made available for determining the appropriate PSAP for routing of the text message content.² A coarse location is considered “good enough” to determine routing to the appropriate PSAP (or other Public Safety entity) as compared to a precise (position) location needed for dispatching emergency services to a caller.

Applying Phase II location standards would have an unintended chilling effect on the deployment of location delivery strategies. The current architectures being described in the ATIS/JSMS911³ effort use different location technologies than are currently used with voice 9-1-1. Wireless voice 9-1-1 location technology is tightly coupled to a circuit-switched architecture. Text-to-911 is essentially a commercial service and will need to use commercial location techniques. The subtle differences between voice and text location management are also a worthy topic for PSAP training as part of the introduction of text-to-911 services. While the technical anomalies that lead to the differences in processing 9-1-1 calls versus text-to-911 messages would be minimized over time, the interim nature of emergency text services as a transition to full NG911 services make such improvements economically difficult to require as part of a mandatory Phase II-like scheme, and may even be counterproductive if the mandate diverts resources from NG911 development. That being said, TCS is committed to providing its clients with text routing mechanisms and commercial location information that is of maximum utility to PSAPs and

² From the JSMS911 Draft 8.

³ The ATIS/JSMS911 effort will be referenced several times in this Comment. It is a collaboration to develop industry standard SMS to 9-1-1 guidelines begun between WTSC SN and TIA TR45.8. The output of this joint project, "JSMS911", will allow an SMS text user to use the publicly known 9-1-1 emergency short code to begin text communication with a Public Safety Answering Point (PSAP). <http://www.atis.org/0160/jointinfo.asp>

emergency responders, and is confident these will improve over time.

D. Phase II E911 Location Measurement Accuracy Rules are Not Applicable to Text-to-911

As noted above, and in TCS's experience, the Commission's analysis and tentative conclusions regarding the availability, consistency, and reliability of location information in the context of text-to-911 messages are essentially correct: the Commission's Phase II location measurement accuracy requirements should not be applied to text-to-911 at this time because the existing 9-1-1 infrastructure which is subject to the location accuracy requirements cannot be easily or consistently repurposed for text-to-911 architectures.

E. A Centralized PSAP Database For Routing Of Text-to-911 Messages Is Unnecessary And Contrary To Developing Standards

In TCS' opinion, a national centralized PSAP routing preference database is unnecessary. First, a database may be superfluous because many PSAPs may initially choose (due to low initial volume) to accept all text-to-911 messaging along with similarly routed voice calls making an initial level of "pre-routing" unnecessary. Second, as part of the migration to NG911, PSAP preferences for routing of voice and all other multimedia can and will be managed at the ESInet level. PSAP media management is an essential part of all ESInets, and will increase as the number of IP/NENA i3 ESInet deployments increases. Therefore, the value of such a database would decrease rapidly over time. Third, establishment of a single centralized routing preferences database is not a Next Generation 9-1-1 oriented solution, and is not addressed in the NENA i3 standards.

F. Text-to-911 Delivery As A TTY Message Should Be The Affirmative Decision Of The PSAP

Applicable NENA i3 standards and the voluntary carrier agreement envision that PSAPs would formally declare their messaging preference, and no PSAP should receive a text-to-911 message as a TTY message without prior acknowledgement of this preference.

G. If Implemented According Standards, Text-to-911 Should Not Be Susceptible To Spoofing

The architecture as defined by the ATIS/JSMS911 working group includes a definition to limit event initiation recognition to only mobile handsets with valid text messaging subscriptions. Non-handset SMS origination is not supported in the current ATIS/JSMS911 standard.⁴

H. Carriers Should Not Be Required To Comply With Non-Standard Architectures

As part of its review in this Docket, the Commission poses various technical questions regarding the implementation and support of emergency texting service. The common denominator for technical issues should be relevant industry standards. Proposals for technical issues or administration that materially differ from industry consensus crafted standards should not be considered. Carriers should not be required to follow non-standardized architectures.

However, that also means that where there is legitimate disagreement or a recognized gap in the national architecture, consensus needs to be achieved. To assist the Commission in its

⁴ The network will not recognize other non-CMRS emergency messaging, and will not provide location information. A text request for emergency assistance without location will result in a bounce-back message.

review, TCS has provided a comparison of the leading collaboration efforts as Attachment A.⁵ While these standards are evolving, these efforts provide the pathway for an efficient and uniform national text-to-911 rollout.

I. Liability Protection Is Essential For Text-to-911 And Future NG911 Services

There can be endless circular debate about the existence or lack of adequate liability protection for all parties involved in the emergency services communication chain, including the texting party, carrier, intermediate vendors, PSAPs, first responders, and others. However, no party has advanced an argument in favor of inadequate future protection. So long as any doubt remains, the Commission should seek enabling legislation from Congress that definitively removes liability for text-to-911 and future NG911 services.

II. Intellectual Property Rights

As a reiteration of our comments to Part III. A, though not cited specifically in the Notice, a discussion of Intellectual Property Rights (“IPR”) is fundamental to this inquiry. TCS has previously filed a Petition for Rulemaking with the Commission on this issue⁶ (“Petition”) which has been released for public comment, and incorporates by reference its Petition to these Comments.⁷ IPRs play an indispensable role in the success of text-to-911.

⁵ Attachment A consists of four columns: 1) The voluntary agreement among the four major carriers, NENA, and APCO; 2) The FCC’s Appendix B Proposed Rules; 3) EAAC WG1 “Interim Text” User NEEDs (current draft); and 4) The ATIS/JSMS911 draft standard (current as of 1/12/13).

⁶ In the Matter of Reasonable and Nondiscriminatory Licensing of Patents Essential to Implementation of Mandatory E911 FCC Rules and Standards, GN Docket No. 11-117, WC Docket No. 05-196, PS Docket No. 11-153, PS Docket No. 10-255 (Filed July 24, 2012).

⁷ The Petition was published for public comment on February 22, 2013 in GN DOCKET 11-117, WC DOCKET 05-196, PS DOCKET 11-153, and PS DOCKET 10-255. Comments are due on March 25, 2013, and Reply Comments are due on April 8, 2013.

The FCC's desire to issue mandatory text-to-911 requirements, even in a minimal framework, will create an inadvertent arbitrage opportunity for litigation-focused patent assertion entities, sometimes called "patent trolls,"⁸ that use the FCC's rules to force carriers and their vendors into licensing agreements or face crippling litigation expenses. While the direct effect of such actions is delayed or modified compliance with FCC directives, or a potential injunction forcing a vendor or carrier to immediately cease operations,⁹ the chilling effect on future compliance and/or technological advancement is even more damaging to first responders and the general public's safety. The Commission has a historic opportunity to act on TCS's Petition in this docket and redirect the foreseeable avalanche of nuisance litigation that will surround text-to-911 and future NG911 services if nothing is done.

Conclusion

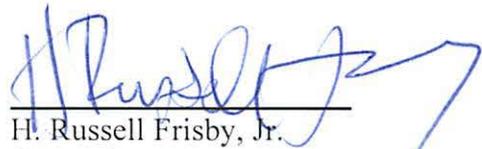
In summary, TCS urges the Commission to act in accordance with its comments herein, and further encourages the Commission to resolve the additional open question regarding IPR highlighted by this Notice and TCS's Petition.

Respectfully submitted,

⁸ http://en.wikipedia.org/wiki/Patent_troll

⁹ Section 283 of the Patent Act provides for granting injunctive relief at the district court level "in accordance with the principles of equity". . . "The several courts having jurisdiction of cases under this title may grant injunctions in accordance with the principles of equity to prevent violation of any right secured by patent, on such terms as the court deems reasonable." U.S.C. Courts may grant preliminary injunctions and/or permanent injunctions under § 283. In 2006, the Supreme Court clarified that an injunction should not be denied simply on the basis that the patent owner does not practice the patented invention. *eBay Inc. v. MercExchange, L.L.C.*, 547 U.S. 388 (2006). Rather, the court must determine whether the patent owner has demonstrated entitlement to a permanent injunction under a four-factor test: (1) that it has suffered an irreparable injury; (2) that remedies available at law, such as monetary damages, are inadequate to compensate for that injury; (3) that, considering the balance of hardships between the plaintiff and defendant, a remedy in equity is warranted; and (4) that the public interest would not be disserved by a permanent injunction. *Id.* Since the 2006 ruling in *eBay*, numerous courts have employed the four-factor test and still granted injunctive relief.

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ATTACHMENT A

FCC's Appendix B Proposed Rules	Voluntary Agreement Among the Four Major Carriers, NENA, and APCO	EAAC SC1 "Interim Text" User NEEDs (DRAFT ver .13);	ATIS/JSMS911 DRAFT Standards (Ballot Version).
<p>(1) CMRS providers subject to this section shall provide an automated error text message that notifies consumers attempting to send text messages to 911 in areas where text-to-911 is unavailable or in other instances where the carrier is unable to transmit the text to the PSAP serving the texting party's location for reasons including, but not limited to, network congestion, the inability of the PSAP to accept such messages, or otherwise. The requirements of this paragraph only apply when the CMRS provider (or the CMRS provider's text-to-911 vendor) has direct control over the transmission of the text message. The automatic notification must include information on how to contact the PSAP. CMRS providers shall meet the requirements of this paragraph no later than June 30, 2013.</p>	<p>5) Before the deployment of Text-to-9-1-1, the signatory service providers will implement a bounce-back (auto-reply) message to alert subscribers attempting to text an emergency message to instead dial 9-1-1 when Text-to-9-1-1 is unavailable in that area. The signatory service providers will implement the bounce-back (auto-reply) message by June 30, 2013.</p>	<p>(8.II.i) "Bounce Back" Notifications: An automatic response should be provided if Text-to-9-1-1 service is unavailable due to lack of network or PSAP support. Additional research may be required to provide a "bounce back" notification when service is unavailable in certain technically challenging situations, such as roaming.</p>	<p>(JSTD-110 DRAFT 6.10,11,13) 10. If SMS to 9-1-1 is not supported in the wireless operator network, the wireless operator should generate a message similar to the bounce-back message indicating that SMS to 9-1-1 is not supported and the subscriber should place a voice call to 9-1-1. 11. If an SMS to 9-1-1 message cannot be routed to a text-capable PSAP from a given location, the TCC (see clause 7.2.1 Text Control Center (TCC)) shall generate a bounce-back message indicating that SMS to 9-1-1 is not available in their location and the subscriber should place a voice call to 9-1-1. 13. The bounce-back message shall be a single, non-segmented SMS message in English that is sent back to the directory number of the user by the TCC (see clause 7.2.1 Text Control Center (TCC)).</p>
<p>(2) No later than May 15, 2014, CMRS providers shall offer their subscribers the capability to send 911 text messages to the appropriate PSAP from any text-capable wireless handset.</p> <p>(a) CMRS providers must provide their subscribers with at least one pre-installed text-to-911 option per mobile device model under a CMRS provider's direct control. The pre-installed text-to-911 option must be capable of operating over the provider's entire network coverage area. Where a consumer has obtained the device from an unaffiliated third party and uses the device on a CMRS provider's network, CMRS providers must offer a text-to-911 application that the consumer can load on to the device.</p>	<p>1) Text-to-9-1-1 service would be made available by May 15, 2014, although carriers may choose to implement such a service prior to that date. Once a carrier begins offering a Text-to-9-1-1 solution, valid PSAP requests for Text-to-9-1-1 service will be implemented within a reasonable amount of time of receiving such request, not to exceed six months. A request for service will be considered valid if, at the time the request is made: a) the requesting PSAP represents that it is technically ready to receive 9-1-1 text messages in the format requested; and b) the appropriate local or State 9-1-1 service governing authority has specifically authorized the PSAP to accept and, by extension, the signatory service provider to provide, text-to-9-1-1 service (and such authorization is not subject to dispute).</p>	<p>(8.II.a) Direct Access: SMS-based Text-to-9-1-1 should ensure a message originator has direct access to an appropriate PSAP without initially contacting a relay service. & (8.II.c) Wireless subscribers with SMS capable handsets: Message originators must not be required to pre-register to initiate SMS-based Text-to-9-1-1, but a valid SMS service subscription is required.</p> <p>(8.II.c) Wireless subscribers with SMS capable handsets: Message originators must not be required to pre-register to initiate SMS-based Text-to-9-1-1, but a valid SMS service subscription is required.</p>	<p>(J-STD-110 DRAFT 6.6) Support for SMS to 9-1-1 text messages is only required for native SMS originated from CMRS devices. The SMS to 9-1-1 system may block SMS to 9-1-1 messages from originations other than CMRS devices to deal with security issues such as denial of service attacks, fraud, and SMS spam.</p> <p>(J-STD-110 DRAFT 6.6) Support for SMS to 9-1-1 text messages is only required for native SMS originated from CMRS devices. The SMS to 9-1-1 system may block SMS to 9-1-1 messages from originations other than CMRS devices to deal with security issues such as denial of service attacks, fraud, and SMS spam.</p>

<p>(b) To meet the requirement of paragraph (2), CMRS providers may select any reliable method or methods for text routing and delivery. For example, CMRS providers may use Short Message Service (SMS), mobile-switched, or Internet Protocol (IP)-based methods for text routing and delivery.</p>	<p>3) Consistent with the draft ATIS Standard for Interim Text-to-9-1-1 service, the PSAPs will select the format for how messages are to be delivered. Incremental costs for delivery of text messages (e.g. additional trunk groups to the PSAP's premises required to support TTY delivery) will be the responsibility of the PSAP, as determined by individual analysis.</p>	<p>(8.III.a) Originating service providers should utilize a standards-based approach (e.g., ATIS-TIA industry standard for wireless carrier native SMS to 9-1-1) based on the C/E gateway architecture in order to minimize implementation challenges for industry and PSAPs and ensure the consistent availability of Text-to-9-1-1 service for industry, PSAPs and consumers independent of the originating network capabilities. Originating network, device and service providers should not be expected to support third-party proprietary services or solutions.</p>	
<p>(3) 911 is the designated short code for text messages sent to PSAPs.</p>	<p>4) The signatory service providers will implement a '9-1-1' short code that can be used by customers to send text messages to 9-1-1.</p>	<p>(8.II.b) 911 digits: Using any number besides "911" to originate SMS-based Text-to-9-1-1 will create public confusion and add uncertainty to an emergency communication. Alternative technical or educational solutions may be necessary if the three digit code "911" is not supported by existing wireless handsets or SMS network architectures or standards.</p>	<p>(J-STD-110 DRAFT 6.3) The SMS short code for texting messages to emergency services shall be the three digits "911".</p>
<p>(4) CMRS providers must route all 911 text messages to the appropriate PSAP, based on the cell sector to which the mobile device is connected. In complying with this requirement, CMRS providers must route text messages to the same PSAP to which they currently route 911 calls, unless the responsible local or state entity designates a different PSAP to receive 911 text messages and informs the carrier of that change.</p>		<p>(8.III.a) Originating service providers should utilize a standards-based approach (e.g., ATIS-TIA industry standard for wireless carrier native SMS to 9-1-1) based on the C/E gateway architecture in order to minimize implementation challenges for industry and PSAPs and ensure the consistent availability of Text-to-9-1-1 service for industry, PSAPs and consumers independent of the originating network capabilities. Originating network, device and service providers should not be expected to support third-party proprietary services or solutions.</p> <p>(8.III.b) Consistent with recognized standards (e.g., ATIS-TIA industry standard for wireless carrier native SMS to 9-1-1), Public Safety Authorities and PSAPs should choose whether to request and the method of delivery of Text-to-9-1-1 communications. If a PSAP chooses not to accept Text-to-9-1-1 communications ("non-participating PSAP"), an alternative PSAP ("designated PSAP") shall be chosen to accept and handle Text-to-9-1-1 communications.</p>	<p>(J-STD-110 DRAFT 6.4) Routing of the initial SMS to 9-1-1 message to the appropriate PSAP shall minimally be done on a per cell/sector basis. Subsequent SMS to 9-1-1 messages in the dialogue are routed to the same PSAP as the initial message.</p>

<p>(5) <i>Roaming</i>. When a consumer is roaming, both the home and visiting network operators must cooperate to support the delivery of the text to the appropriate PSAP serving the sender's location.</p>	<p>8) A voluntary SMS-to-9-1-1 solution will be limited to the capabilities of the existing SMS service offered by a participating wireless service provider on the home wireless network to which a wireless subscriber originates an SMS message. SMS-to-9-1-1 will not be available to wireless subscribers roaming outside of their home wireless network. Each implementation of SMS-to-9-1-1 will be unique to the capabilities of each signatory service provider or its Gateway Service Provider.</p>	<p>(8.II.e) SMS Roaming: Due to existing SMS network standards and architectures, SMS-based Text-to-9-1-1 may not be available when a text message is originated on a wireless network other than the home wireless network to which a message originator has a valid subscription (i.e., roaming on a wireless network). Additional research may be required to provide a "bounce back" notification in this situation.</p>	<p>(J-STD-110 4.7) Roaming is not addressed in this version of this Standard. a. Support of SMS to 9-1-1 for international roamers to the United States is not required. b. SMS to 9-1-1 is not supported for US subscribers roaming outside of the US. c. Support of SMS to 9-1-1 for US subscribers roaming between US wireless operator networks is for future study. The subscriber will receive an SMS response message indicating that they need to place a voice call to 9-1-1.</p>
<p>(6) Third party interconnected text providers. (a) All third-party interconnected text application providers that offer the capability for consumers to send to and receive text messages from text-capable mobile telephone numbers shall send an automated error text message when a user of the application attempts to send an emergency text in an area where text-to-911 is not supported or the provider is otherwise unable to transmit the text to the PSAP for reasons including, but not limited to, network congestion, the inability of the PSAP to accept such messages, or otherwise. The automatic error notification must include information on how to contact the PSAP. Third party interconnected text providers subject to this paragraph shall meet the above requirements no later than June 30, 2013.</p> <p>(b) No later than May 15, 2014, all third party interconnected text providers that provide the capability for consumers to send to and receive text messages from text-capable mobile telephone numbers must offer the capability described in paragraph (n)(2) during time periods when the mobile device is connected to a CMRS network.</p>		<p>(8.I.d) All Text-to-9-1-1 solutions, including native SMS-based and "Over the Top"/third party text messaging services, should utilize a standards-based approach based on the C/E gateway architecture in order to minimize implementation challenges for industry and PSAPs and ensure the consistent availability of Text-to-9-1-1 service for industry, PSAPs and consumers. Industry, PSAPs and consumers should not be expected to utilize non-standards-based Text-to-9-1-1 solutions. PSAPs can voluntarily choose to select a non-standards-based Text-to-9-1-1 solution, but industry should not be expected to support these non-standards-based solutions.</p> <p>(8.II.a) Direct Access: SMS-based Text-to-9-1-1 should ensure a message originator has direct access to an appropriate PSAP without initially contacting a relay service. & (8.II.c) Wireless subscribers with SMS capable handsets: Message originators must not be required to pre-register to initiate SMS-based Text-to-9-1-1, but a valid SMS service subscription is required.</p>	<p>(JSTD-110 DRAFT 6.10,11,13) 10. If SMS to 9-1-1 is not supported in the wireless operator network, the wireless operator should generate a message similar to the bounce-back message indicating that SMS to 9-1-1 is not supported and the subscriber should place a voice call to 9-1-1. 11. If an SMS to 9-1-1 message cannot be routed to a text-capable PSAP from a given location, the TCC (see clause 7.2.1 Text Control Center (TCC)) shall generate a bounce-back message indicating that SMS to 9-1-1 is not available in their location and the subscriber should place a voice call to 9-1-1. 13. The bounce-back message shall be a single, non-segmented SMS message in English that is sent back to the directory number of the user by the TCC (see clause 7.2.1 Text Control Center (TCC)).</p> <p>(J-STD-110 DRAFT 6.6) Support for SMS to 9-1-1 text messages is only required for native SMS originated from CMRS devices. The SMS to 9-1-1 system may block SMS to 9-1-1 messages from originations other than CMRS devices to deal with security issues such as denial of service attacks, fraud, and SMS spam.</p>
	<p>2) Beginning no later than July 1, 2013, the four signatory service providers will voluntarily provide quarterly progress reports to the FCC, NENA, and APCO summarizing the status of the deployment of a national Text-to-9-1-1 service capability. Once a service provider is able to deploy service for capable PSAPs on a national basis, it would no longer be required to provide these status reports.</p>		

6) The signatory service providers will meet these commitments independent of their ability to recover these associated costs from state or local governments.

7) The signatory service providers (whether individually or through a third party) will work with APCO, NENA, and the FCC to develop an outreach effort to set and manage consumer expectations regarding the availability/limitations of the Text-to-9-1-1 service (including when roaming) and the benefits of using voice calls to 9-1-1 whenever possible, and support APCO and NENA's effort to educate PSAPs on Text-to-9-1-1 generally.

(8.IV) The EAAC recommends that the FCC consider the following public education issues related to Text-to-9-1-1 services:

- a. Under the coordination of the FCC, national Public Safety organizations and state and local public safety entities, along with leading deaf, deaf-blind, and hard of hearing organizations, should lead the education efforts with their citizens about the availability and limitations of Text-to-9-1-1 services.
- b. Other stakeholders, such as industry and other organizations representing individuals with disabilities, should provide support where appropriate and consistent with FCC and public safety public education efforts.
- c. The FCC should provide information about the availability of Text-to-9-1-1 consistent with open government policies (e.g., make data available for third parties to utilize).