



March 22, 2013

(Filed electronically)

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **Ex Parte Notice** - PS Docket 11-153 and PS Docket No. 10-255

Dear Ms. Dortch:

On March 20, 2013, members of the Voice on the Net (VON) Coalition, represented by Paula Boyd and Laura Carter of Microsoft, Adrienne Biddings and Darah Franklin of Google (both by phone), Deontrea Campbell, VON intern, and Glenn Richards, Executive Director, met with Charles Mathias, Special Counsel to Chairman Genachowski, Henning Schulzrinne, Office of Strategic Policy, Brendan Carr, Office of General Counsel, and Tim May, Aaron Garza, Dana Zelman (by phone), Erika Olsen (by phone), David Siehl and David Furth, all of the Public Safety and Homeland Security Bureau.

During the meeting, VON discussed its comments filed in the above referenced proceedings concerning the ability of over-the-top IP-based SMS services to send a bounce back message to a user attempting to text 911 when such routing is not available. More specifically, VON made the following points:

- The Commission should consider 911 requirements on IP services in the context of a next generation 911 network.
- The Commission lacks legal authority to impose legacy 911 obligations, including the bounce back message, on IP services.
- If the Commission acts, it should clearly, limit any requirements to interconnected text services.
- If the Commission acts, it should allow interconnected text services to meet the Commission's bounce back message requirement by having the interconnected text application generate the alert.
- The Commission should not impose rigid standard alert language, but instead it may be worthwhile to establish alert language that constitutes a safe harbor.
- Since interconnected text providers operate on a variety of platforms and handle 911 calls in a variety of ways, the Commission should provide additional time for providers to come into compliance with any bounce back message requirement it imposes.



March 22, 2013
Page 2

Please contact me directly if you have any questions.

Sincerely,

/s/

Glenn S. Richards
Executive Director

cc: Charles Mathias (by email)
Henning Schulzrinne (by email)
Brendan Carr (by email)
Tim May (by email)
Aaron Garza (by email)
Dana Zelman (by email)
Erika Olsen (by email)
David Siehl (by email)
David Furth (by email)