

GN docket 11-117; WC docket 05-196; PS docket 11-153; PS docket 10-255

INdigital telecom is an E911 and NG9-1-1 system service provider in the midwest region. INdigital has been a pioneer in the development and deployment of NG9-1-1 systems since 2006. In the provision of E911 service, INdigital has been in compliance with the FCC's regulations.

As a E911 System Service Provider, INdigital operates several types of public safety networks. These operations now make the company a defendant in a PAE lawsuit. INdigital shares TCS's concerns. These lawsuits, brought directly or indirectly via our customers or other vendors, are based on the mere fact that the company is in compliance with the Commission's E911 regulations or widely published industry standards.

By these comments, INdigital urges the Commission to take action as recommended by the TCS petition in the above captioned dockets.

INdigital concurs with the TCS petition statement that "It would be unfortunate for the Commission to fail to act at least in this minimalist fashion in order to ensure that public safety vendor are not unjustly driven from the industry."

We additionally concur that at a minimum, the Commission should modestly expand its prior rulings to more generally require that IPR licensing rights be reasonable and nondiscriminatory where the proposed use is to ensure compliance with the Commission's rules.

Respectfully submitted,

Mark Grady, President and Founder
INdigital telecom