

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

REPLY COMMENTS OF INTRADO INC.

Intrado Inc. (Intrado) respectfully submits its reply comments in the above referenced proceeding which are focused on the proposal of Bandwidth.com, Inc. (Bandwidth) to create a national clearinghouse for text-to-911. According to Bandwidth, the clearinghouse would include exclusive control over diverse functions that are currently a part of text-to-911 deployments.¹ For example, Bandwidth proposes a clearinghouse architecture which includes a single vendor developing and deploying the Emergency Call Routing function (ECRF) for text.² Bandwidth's proposal also includes a single Emergency Service Routing Proxy (ESRP) for routing texts to PSAPs, presumably requiring all ESInets or PSAP text providers to connect to Bandwidth for the delivery of text messages.³

Bandwidth's proposal appears to be a solution in search of a problem. The infrastructure allowing originating service providers to support text-to-911 already exists, and it includes routing databases developed by entities such as Intrado. Similarly, PSAPs have options for

¹ Comments of Bandwidth.com, Inc. at 3.

² *Id.* at 6, 11.

³ *Id.*

enabling the receipt of text-to-911 messages and some are already capable of receiving texts through a state-wide ESInet or through individual relationships with 911 service providers.

Multiple vendors can easily co-exist in conjunction with national deployment of text-to-911, and existing deployments should not be disturbed to accommodate a single-vendor clearinghouse. A multi-vendor text environment promotes competition and innovation and is the best approach to achieve cost containment. This multi-vendor approach is similar to the deployment of wireless E911 in which multiple parties provide Mobile Positioning Center (MPC) functionality to wireless carriers.

Originating service providers or their third party vendors will provide the TCC function for text messages destined for PSAPs. PSAPs or their third-party providers will enable the receipt of text messages through one of the options chosen by the PSAP. These responsibilities are reflected in the attached Exhibit A. Ultimately, the participants will need to work directly together to ensure effective deployment. However, that collaboration is technically possible and occurs today through adherence to i3 or pre-i3 standards which envision a “plug and play” approach to deployment. In fact, TCS states, “establishment of a single centralized database is not a Next Generation 9-1-1 oriented solution, and is not addressed in the NENA i3 standards.”⁴ Attached Exhibit B illustrates how texts-to-911 provisioned through multiple vendors will be routed using interoperable interfaces.

The single-vendor gateway cannot be justified as a mechanism for PSAP notification or for the development of a future national Forest Guide. There is no compelling need for a centralized notification database as PSAPs and carriers have to actively interact with each other in deploying text-to-911. Certainly, in an all internet protocol (IP) NG911 environment where calls are routed using the internet rather than designated service providers, there is a need for

⁴ TCS Comments at 4.

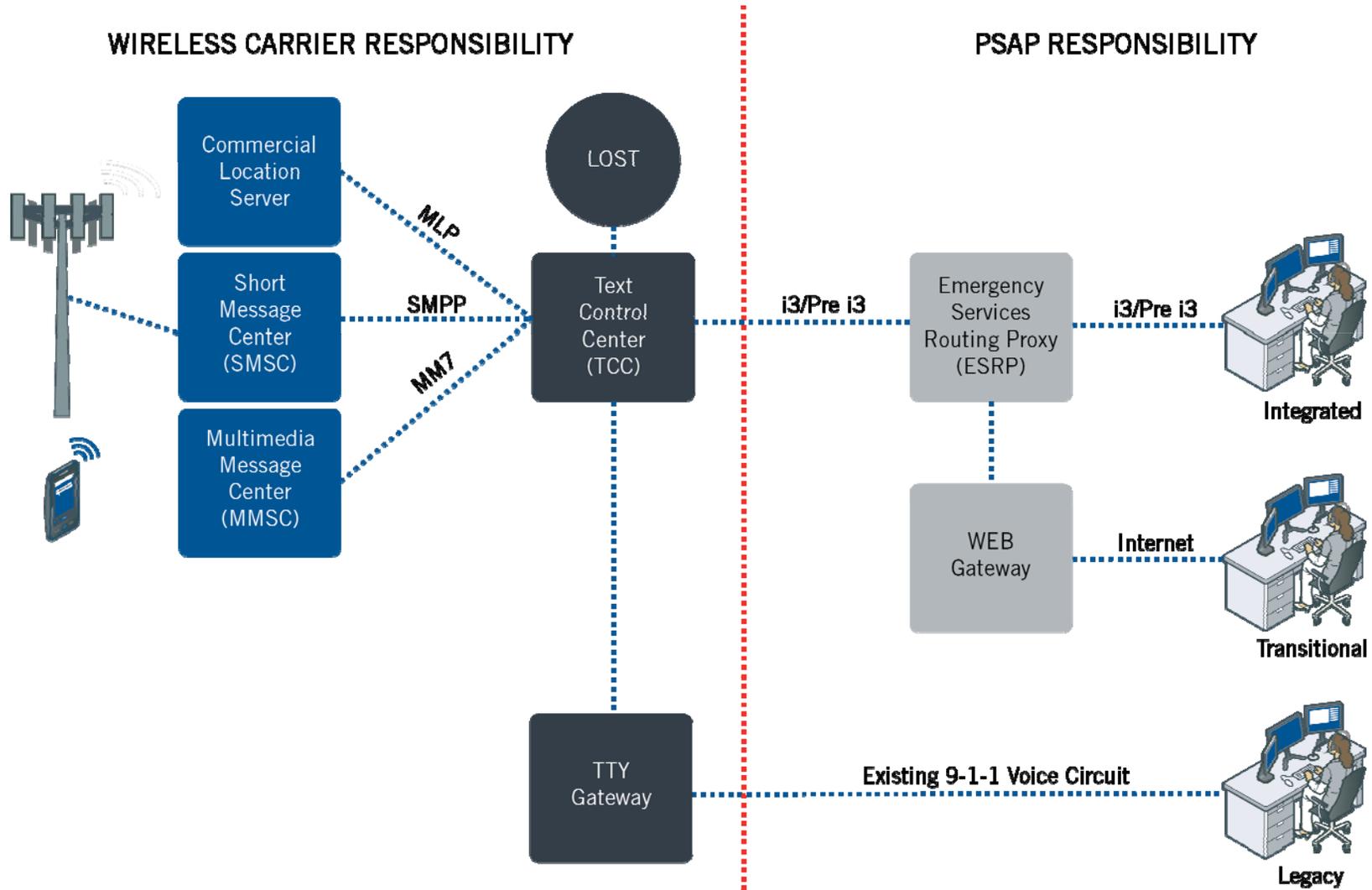
interoperable (and hierarchal) routing guides. However, that need does not exist today and there are both policy and operational issues that need to be addressed before the implementation and use of a national Forest Guide can be determined.

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Text-to-9-1-1 Defined



Interoperability

