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Executive Director  
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April 16, 2013

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**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153; Framework for Next Generation 911 Deployment, PS Docket No. 10-255**

Dear Ms. Dortch:

On April 12, 2013, Robert Morse and the undersigned of Verizon, and Susan Sherwood of Verizon Wireless (together “Verizon”), met via teleconference with David Furth, Aaron Garza, Nicole McGinnis, Erika Olsen, David Siehl, and Dana Zelman of the Public Safety and Homeland Security Bureau, and Henning Schulzrinne of the Office of Strategic Planning and Policy Analysis, to discuss matters relating to the text-to-911 requirements proposed in the above-referenced proceedings.<sup>1</sup>

Verizon discussed the status of its text-to-911 deployments at staff’s request and its processes for responding to PSAP requests. Verizon has initiated service for eight PSAPs since 2011, and is currently working with over a dozen others with the objective of voluntarily initiating service in those markets over the next several months. Verizon also explained that it has received several inquiries from other PSAPs that have opted not to pursue the matter further this time.

Verizon reiterated that, should the Commission mandate an automatic reply “bounceback” by the proposed July 1, 2013 deadline, such regulations should be consistent with the Voluntary Agreement.<sup>2</sup> Verizon described how its text-to-911 solution enables a PSAP to reinstate the same bounceback message in circumstances where its call takers are overloaded with text messages, and stated that the Commission

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<sup>1</sup> See *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, Framework for Next Generation 911 Deployment*, Further Notice of Proposed Rulemaking, 27 FCC Rcd 15659 (2012).

<sup>2</sup> See Letter from APCO, NENA, AT&T, Sprint, T-Mobile, and Verizon, PS Docket Nos. 11-153 and 10-255, filed Dec. 6, 2012 (the “Voluntary Agreement”).

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should therefore modify the term “network congestion” in the proposed rule so that any obligation to reinitiate the bounceback message is expressly limited to those circumstances.<sup>3</sup> Verizon also reiterated that flexibility remains warranted for the bounceback message content.<sup>4</sup>

Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Neeka Chazor".

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<sup>3</sup> See Verizon *Ex Parte* Presentation in PS Docket Nos. 11-153 and 10-255, filed February 20, 2012, at 1.

<sup>4</sup> See *id.* at 1-2.