

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
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
)	

**PETITION FOR RECONSIDERATION, OR IN THE ALTERNATIVE, FOR
CLARIFICATION OF CTIA – THE WIRELESS ASSOCIATION®**

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I. INTRODUCTION AND SUMMARY

Pursuant to Section 1.429 of the Commission’s rules, 47 C.F.R. § 1.429, CTIA – The Wireless Association® (“CTIA”) respectfully submits this Petition for Reconsideration, or in the alternative, clarification of the Commission’s Order in the above-captioned proceeding involving roaming requirements.¹ At the outset, CTIA notes that the relief it requests will *not* prevent consumers who are roaming from receiving the bounce-back message mandated under new rule Section 20.18(n)(3).² Although CTIA and its member companies stand ready to provide an

¹ *In the Matter of Facilitating the Development of Text-to-911 and Other Next Generation 911 Applications*, PS Docket No. 11-153; and *In the Matter of Framework for Next Generation 911 Deployment*, PS Docket No. 10-255, Order, FCC 13-64 (rel. May 17, 2013) (“Order”).

² CTIA and its member companies share the goal of ensuring that the public can effectively use emergency communications services during times of need. Confirming this commitment, in December 2012, CTIA member companies AT&T, Sprint, T-Mobile, and Verizon Wireless entered into a voluntary agreement to enable text-to-9-1-1 on their networks. *See* Letter from Terry Hall, APCO International, Barbara Jaeger, NENA, Charles W. McKee, Sprint Nextel, Robert W. Quinn Jr., AT&T, Kathleen O’Brien Ham, T-Mobile USA, and Kathleen Grillo, Verizon, to Julius Genachowski, Chairman, Federal Communications Commission, and Commissioners McDowell, Clyburn, Rosenworcel, and Pai, PS Docket No. 11-153, PS Docket No. 10-255 (Dec. 6, 2012) (“Carrier-NENA-APCO Agreement”). Indeed, the Carrier-NENA-APCO agreement specifically omitted roaming requirements because of the carriers’ well-founded technical feasibility concerns.

interim text-to-9-1-1 solution, CTIA believes that the Commission's recently adopted Order imposes technically infeasible obligations on CMRS providers.

To remedy this problem, CTIA respectfully requests that the Commission eliminate the requirements imposed in paragraph 72 of the Order and Section 20.18(n)(7) of the new rules ("the roaming rule"). The Commission should not address roaming requirements until appropriate technical organizations are able to confirm that such requirements are technically feasible.

In the alternative, the Commission should delete Section 20.18(n)(7) and amend Section 20.18(n)(3) to read as follows (additional text in bold):

(3) No later than September 30, 2013, all covered text providers shall provide an automatic bounce-back message under the following circumstances: (a) a consumer attempts to send a text message to a Public Safety Answering Point (PSAP) by means of the three-digit short code "911", and (b) the covered text provider cannot deliver the text because the consumer is located in an area where: (i) text-to-911 service is unavailable; or (ii) the covered text provider does not support text-to-911 service at the time, **including, for a CMRS provider, an area where the consumer is roaming on the network of another CMRS provider.**

Eliminating or modifying the rules described above will help ensure that the Commission complies with its statutory obligations. As adopted, the Commission did not provide adequate notice of the roaming requirement because commenters were instructed not to address roaming during the bounce-back message portion of this proceeding.³ Moreover, the rule is inconsistent with the Twenty-First Century Communications & Video Accessibility Act ("CVAA") because, to the extent that the Commission relies on the CVAA as the rule's basis of authority, the rule

³ *Facilitating the Deployment of Text-to-9-1-1 and Other Next Generation 911 Applications, Framework for Next Generation 911 Deployment, Further Notice of Proposed Rulemaking*, FCC 12-149, ¶ 20 (Dec. 13, 2012) ("FNPRM").

must be “achievable and technically feasible.”⁴ However, as set forth below, the rule does not meet either of these requirements.

While CTIA and its member companies are committed to facilitating the deployment of viable solutions for text-based 9-1-1 communications, CTIA believes that the rules must assign responsibilities to carriers in a manner that reflects technical realities. As CTIA has noted, the relief it requests will not prevent wireless subscribers who are roaming from receiving a bounce-back message consistent with the new rule 20.18(n)(3). Instead, the relief CTIA seeks will simply allocate carrier responsibilities in a way that aligns with technical realities.

II. THE COMMISSION’S REQUIREMENT THAT A CMRS PROVIDER MUST PROVIDE AN AUTOMATIC BOUNCE-BACK MESSAGE WHEN A CONSUMER IS ROAMING ON ITS NETWORK IS NOT TECHNICALLY FEASIBLE

The Commission’s requirement that CMRS providers must “provide an automatic bounce-back message to any consumer roaming on its network who sends a text message to 911,” codified in Section 20.18(n)(7) of the rules, was adopted with minimal discussion of the rule’s practicality or technical feasibility.⁵ Indeed, paragraph 72 of the Order provides a cursory discussion of the rule that ignores record evidence explaining that the rule is not technically feasible. Both the Joint ATIS/TIA Native SMS to 9-1-1 non-proprietary technical standard and the Commission’s Emergency Access Advisory Committee (“EAAC”) reports have emphasized that the technical feasibility of providing an automatic bounce-back message to a roaming subscriber has not yet been determined. The Joint ATIS/TIA Native SMS to 9-1-1 non-proprietary technical standard, for example, specifically declined to address roaming by

⁴ 47 U.S.C. § 106(g).

⁵ 47 C.F.R. § 20.18(n)(7).

explaining that roaming issues were “for future study.”⁶ Similarly, the EAAC has reported that “in inter-carrier domestic or international roaming situations, SMS-to-9-1-1 cannot, at this point, be supported because addressing the ‘Text Origination Information’ and ‘Home Network Control’ issues would require significant modifications to the wireless originator network and core infrastructure that will ultimately delay the deployment of SMS-to-9-1-1 services.”⁷ Accordingly, the EAAC recommended that the Commission and appropriate standards organizations, in consultation with appropriate stakeholders, study the roaming issue to determine whether it can be resolved, without significant network architecture modifications, before the NG9-1-1 transition is completed.⁸ Despite these well-documented technical feasibility challenges, the Commission’s Order imposes roaming requirements on CMRS providers that ignore current technical realities.

Current network architectures do not permit serving carriers⁹ to provide wireless subscribers roaming on their networks with an automatic bounce-back message. As commenters in this proceeding have confirmed, existing network architectures are engineered such that *only* the *home carrier* is capable of generating a bounce-back message for roaming subscribers.¹⁰ The

⁶ ATIS & TIA, *Joint ATIS/TIA Native SMS to 9-1-1 Requirements and Architecture Specification*, J-STD-110, at 5 (2013) (“ATIS/TIA Standard”).

⁷ EAAC, *Report of Emergency Access Advisory Committee (EAAC) Subcommittee 1 on Interim Text Messaging to 9-1-1*, at 10 (March 1, 2013) (“EAAC March 2013 Text Messaging Report”).

⁸ *Id.* at 2.

⁹ As used herein, the terms “serving carrier” and “roaming carrier” refer interchangeably to carriers that serve wireless subscribers traveling outside their own home carrier’s network infrastructure to send a native SMS text message.

¹⁰ Reply Comments of the Texas 9-1-1 Entities, PS Docket No. 11-153, PS Docket No. 10-255, at 4 (Feb. 8, 2013) (“Texas 9-1-1 Entities February 2013 Reply Comments”).

EAAC has concluded that SMS messages are under “home operator control,” meaning that such messages “must be routed to a subscriber’s home network for processing, regardless of the network from which the message originated.”¹¹ The Commission’s Order itself highlighted the Texas 9-1-1 Entities’ similar statement that “the *home carrier* of a SMS subscriber may currently need to be responsible for generating the required bounce-back message.”¹² The record thus confirms that generating automatic bounce-back messages is currently beyond the technical capabilities of serving carriers.

Moreover, even though home carriers may be technically capable of generating an automatic bounce-back message for roaming subscribers, technical limitations hinder the effectiveness of such messages. The EAAC has advised that SMS messages sent between wireless provider roaming networks do not automatically pass through the location information that the home carrier needs to determine whether text-to-9-1-1 is supported by the appropriate PSAP.¹³ Without this location data, home carriers are left without any technically feasible way to determine whether an automatic bounce-back message is required under Section 20.18(n)(3) of the new rules due to the subscriber’s location within the jurisdiction of a PSAP that does not support text-to-911 services (*i.e.*, text-to-911 service is unavailable). Consequently, the home network carrier will *always* generate a bounce-back message for any subscriber initiating a text message to 9-1-1 on a serving carrier’s network. Thus, even if the home carrier, serving carrier, and the appropriate PSAP all support the text-to-9-1-1 services, the home carrier will have no

¹¹ *Id.* at 10; *see also* Comments of CTIA – The Wireless Association®, PS Docket No. 11-153, PS Docket No. 10-255, at 13 (Mar. 11, 2013) (“CTIA March 2013 Comments”).

¹² Order, ¶ 71 (quoting Texas 9-1-1 Entities February 2013 Reply Comments at 4) (emphasis added).

¹³ EAAC March 2013 Text Messaging Report at 10.

choice but to generate an automatic bounce-back message to the roaming subscriber. In addition, the requirement may contravene the Commission's public education efforts by creating confusion over where text-to-9-1-1 services are available. A rule that effectively requires CMRS providers to advise subscribers that text-to-9-1-1 service is unavailable when the service is in fact available is contrary to the public interest.

To remedy these technical feasibility problems, the Commission should eliminate the requirements imposed in paragraph 72 of the Order and new Section 20.18(n)(7). The Commission should not address this topic until appropriate technical organizations or standards groups, such as the Alliance for Telecommunications Industry Solutions ("ATIS") and the Telecommunications Industry Association ("TIA") Joint SMS to 9-1-1 Working Group, are able to confirm the technical feasibility of any proposed roaming requirements.

Further, beyond being technically infeasible, Section 20.18(n)(7) is unnecessary. Eliminating Section 20.18(n)(7) would not leave roaming subscribers sending "texts to nowhere" without a bounce-back message stop-gap. Section 20.18(n)(3)(b)(i) requires CMRS providers to generate a bounce-back message when service is "unavailable."¹⁴ Because home network carriers will always send a bounce-back message to a roaming subscriber to comply with their Section 20.18(n)(3)(b)(i) obligation, Section 20.18(n)(7) is superfluous.

In the alternative, at a minimum, the Commission should clarify that Section 20.18(n)(7) applies only to home network operators. As explained above, and as was highlighted in CTIA's recent *ex parte* and comments in this proceeding, only the home carrier has the capability to

¹⁴ 47 C.F.R. § 20.18(n)(3)(b)(i).

generate the required bounce-back message.¹⁵ However, Section 20.18(n)(7), as written, could be read to apply to both the home carrier and the serving carrier or even solely to the serving carrier.¹⁶ Because current network architectures are such that only the home carrier can generate the automatic bounce-back message for a roaming subscriber, the Commission should clarify that the requirements of Section 20.18(n)(7) apply only to the home carrier. The Commission should not impose a regulatory requirement on serving carriers when serving carriers have no control over their ability to comply. Accordingly, CTIA respectfully proposes that Section 20.18(n)(7) be deleted and Section 20.18(n)(3) be revised to read:

(3) No later than September 30, 2013, all covered text providers shall provide an automatic bounce-back message under the following circumstances: (a) a consumer attempts to send a text message to a Public Safety Answering Point (PSAP) by means of the three-digit short code “911”, and (b) the covered text provider cannot deliver the text because the consumer is located in an area where: (i) text-to-911 service is unavailable; or (ii) the covered text provider does not support text-to-911 service at the time, **including, for a CMRS provider, an area where the consumer is roaming on the network of another CMRS provider.**

Eliminating Section 20.18(n)(7) and adopting this revision will help clarify that the Commission’s rules do not assign serving carriers the technically infeasible responsibility of generating automatic bounce-back messages for roaming subscribers.

¹⁵ Letter from Brian M. Josef, Assistant Vice President – Regulatory Affairs, CTIA – The Wireless Association® to Marlene H. Dortch, PS Docket No. 11-153, PS Docket No. 10-255 (Jun. 14, 2013); CTIA March 2013 Comments at 13.

¹⁶ Other commenters in this proceeding have already noted that Section 20.18(n)(7) could be susceptible to a reading that encompasses serving carriers. For example, AT&T recently explained that Section 20.18(n)(7) may “need additional clarification so that the extent of th[e] obligation is merely for the ‘home carrier’ (i.e. the carrier of the customer originating the message) to provide a bounce-back message about the unavailability of text-to-911 services when customers attempt to send text messages to 911 when roaming.”

III. ELIMINATION OR MODIFICATION OF THE BOUNCE-BACK ROAMING RULE WILL ENSURE CONSISTENCY WITH THE COMMISSION'S STATUTORY OBLIGATIONS.

The elimination of Section 20.18(n)(7) of the Rules or the amendment of Section 20(n)(3)(B) proposed above will ensure that the Commission's action with respect to bounce-back messages for roaming customers is consistent with its statutory obligations under the Administrative Procedure Act ("APA") and the CVAA. Either course of action will cure three defects of the Commission's adoption of Section 20.18(n)(7): the *FNPRM*'s failure to provide adequate notice of the adopted rule, the Commission's lack of reasoned decisionmaking supporting adoption of the rule, and the rule's inconsistency with the CVAA.

Failure To Provide Adequate Notice. Under the "logical outgrowth" doctrine, an agency may adopt a final rule that departs from its proposed rule so long as the adopted rule is a "logical outgrowth" of what the agency proposed.¹⁷ This well-established tenet of law, however, presupposes that the agency first offered a proposal for notice and comment.¹⁸ Here, the *FNPRM* expressly instructed commenting parties not to address roaming in the bounce-back portion of the bifurcated comment cycle.¹⁹ Accordingly, in the first portion of the comment

¹⁷ *Ne. Maryland Waste Disposal Auth. v. E.P.A.*, 358 F.3d 936, 951-52 (D.C. Cir. 2004).

¹⁸ *See Env'tl. Integrity Project v. EPA*, 425 F.3d 992, 996 (D.C. Cir. 2005) (The 'logical outgrowth' doctrine does not extend to a final rule that finds no roots in the agency's proposal because '[s]omething is not a logical outgrowth of nothing') (internal citations omitted); *see also Fertilizer Inst. V. EPA*, 935 F.2d 1303, 1311 (D.C. Cir. 1991) ("The key focus in assessing logical outgrowth is 'whether the purposes of notice and comment have been adequately served.'").

¹⁹ *FNPRM*, ¶ 20. The *FNPRM* established a bifurcated comment cycle and directed commenters to "address only the issues posed in this section in order to provide the Commission with a focused record on this question." *Id.* The first portion of the comment cycle solicited comments on the bounce-back requirement and did not contain any targeted questions with respect to roaming. *See id.* ¶¶ 21-41. The second portion of the comment cycle solicited comments on comprehensive text-to-911 proposals and included a sub-section on roaming issues associated with text-to-911. *See id.* ¶¶ 124-26.

cycle, industry parties did not raise the technical feasibility issues posed by an obligation to provide a bounce-back message for roaming customers. Without notice that the Commission was considering a roaming requirement for the bounce-back message, parties could not have anticipated Section 20.18(n)(7)'s adoption. The Commission's subsequent adoption of the rule thus fails the logical outgrowth test.²⁰ Indeed, given that this Petition is CTIA's first opportunity to comment on a serving provider's obligation to provide a bounce-back message to roaming customers, the Commission can hardly argue that it gave adequate notice of the final rule.²¹

Arbitrary and Capricious Due to Lack of Reasoned Decision-making. The lack of record support of the roaming obligation also counsels in favor of its elimination or modification, as the FCC's adoption of Section 20.18(n)(7) is not a product of reasoned decision-making.²² The Order simply concludes that the roaming rule is desirable, though no parties commented on an obligation on the part of the serving provider to provide a bounce-back to consumers roaming on

²⁰ See *CSX Transp., Inc. v. Surface Transp. Bd.*, 584 F.3d 1076, 1080 (D.C. Cir. 2009) (“[A] final rule fails the logical outgrowth test and thus violates the APA's notice requirement where interested parties would have had to divine [the agency's] unspoken thoughts, because the final rule was surprisingly distant from the proposed rule.”) (internal citations and quotations omitted); *Ne. Maryland Waste Disposal Auth. v. E.P.A.*, 358 F.3d 936, 952 (D.C. Cir. 2004) (“A rule is deemed a logical outgrowth if interested parties ‘should have anticipated’ that the change was possible, and thus reasonably should have filed their comments on the subject during the notice-and-comment period.”).

²¹ *Nat'l Ass'n of Home Builders v. U.S. Army Corps of Engineers*, 453 F. Supp. 2d 116, 125 (D.D.C. 2006) (“Our Circuit has stated that [t]his means that a final rule will be deemed the logical outgrowth of the proposed rule if a new round of notice and comment would not provide commentators with their first occasion to offer new and different criticisms which the agency might find convincing.”) (quoting *United Steelworkers of Am. v. Marshall*, 647 F.2d 1189, 1225 (D.C.Cir.1980) (quotations omitted)).

²² Reasoned decision-making requires an agency to “examine the relevant data and articulate a satisfactory explanation for its action[s].” *Motor Vehicle Mfrs. Ass'n v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983). Agency action that fails satisfy the APA's reasoned decision-making requirement is arbitrary and capricious. See *Clark Cnty., Nev. v. FAA.*, 522 F.3d 437, 442 (D.C. Cir. 2008) (finding FAA determinations arbitrary and capricious where FAA did not explain its conclusions and record evidence support opposite conclusions).

its network. Indeed, the Order does not respond to the Texas 9-1-1 Entities' finding that technical realities would require the home carrier to generate the required bounce-back message.²³ Meanwhile, the Order cites comments by MobileTREC to provide support for the rule, but these comments were not specifically directed at the bounce-back portion of the *FNPRM*, though they were filed in the first portion of the comment cycle.²⁴ In its comments, MobileTREC addressed both the bounce-back requirement and general text-to-9-1-1 proposals. Furthermore, the language from MobileTREC's comments cited by the Order makes clear that its discussion of roaming pertains to general text-to-9-1-1 proposals, not specifically the bounce-back requirement.²⁵ The Order also cites comments by APCO, but these relate to the content of the bounce-back message, not its method of transmission. Most importantly, neither APCO nor MobileTREC proposes to impose a burden on the serving carrier by requiring that service carriers issue a bounce-back message to customers roaming on their networks.

In addition to a lack of record support for Section 20.18(n)(7), the record of this proceeding contradicts the adopted rule.²⁶ As explained above, the record in the docket

²³ Order, ¶ 71-72. While the Commission quotes this finding by the Texas 9-1-1 Entities, it does not respond to this revelation in its "Discussion" in paragraph 72.

²⁴ See Order, ¶ 71 n.182 (citing Comments of MobileTREC at 2, PS Docket Nos. 11-153, 10-255 (Jan. 29, 2013) (commenting on paragraph 19 of the *FNPRM*)).

²⁵ *Id.* ("Lack of roaming support *in text-to-911* introduces an unacceptable level of uncertainty") (emphasis added). See also *id.* at 13 ("Roaming must be supported. Consumers will not understand why *text-to-911* isn't working") (emphasis added). MobileTREC specifically addresses the bounce-back requirement elsewhere in its comments, so its reference to "text-to-911" in its roaming discussions must be interpreted to address general text-to-911 proposals.

²⁶ *Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983) ("an agency rule would be arbitrary and capricious if the agency . . . offered an explanation for its decision that runs counter to the evidence before the agency"); *Islander E. Pipeline Co., LLC v. Connecticut Dep't of Env'tl. Prot.*, 482 F.3d 79, 103 (2d Cir. 2006) ("where

demonstrates that the rule is technically infeasible.²⁷ Though the adopted rule imports roaming issues into the bounce-back portion of the proceeding, the Order does not acknowledge information in the general text-to-9-1-1 portion of the proceeding that would counsel against the adoption of such a rule. And while the Texas 9-1-1 Entities counseled the Commission to “further consider the issue of ‘roaming’ in the context of SMS provider responsibilities for bounce back messages,” it counseled in favor of such a requirement being the home provider’s responsibility.²⁸ In light of the record evidence on technical feasibility and the Texas 9-1-1 Entities’ counsel to impose a requirement on the home provider, the Commission’s adoption of Section 20.18(n)(7) is arbitrary and capricious.

A further reason to eliminate Section 20.18(n)(7) is that the provision is internally inconsistent with the Order and other adopted rules.²⁹ On the one hand, the Order emphasizes that the bounce-back rules apply insofar as a provider “has direct control” over the transmission of the text message.³⁰ Yet Section 20.18(n)(7) potentially imposes a bounce-back obligation on a serving provider that does not originate the bounce-back message and thus does not control the first leg of the bounce-back transmission. As noted above, the bounce-back requirement is also

the record directly contradicts the unsupported reasoning of the agency and the agency fails to support its pronouncements with data or evidence, we may not defer.”).

²⁷ See, e.g., *Nuvio Corp. v. FCC*, 473 F.3d 302, 203 (D.C. Cir. 2007) (noting technical feasibility is an inquiry “made necessary by the bar against arbitrary and capricious decision-making”); *Carlin Communications, Inc. v. FCC*, 787 F.2d 846, 847, 856 n.5 (2d Cir. 1986) (remanding to Commission to consider technical feasibility, among other issues).

²⁸ See Order, ¶ 71 (citing Reply Comments of Texas 911 Entities at 4, PS Docket Nos. 11-152, 10-255 (Feb.8, 2013)).

²⁹ See *Air Line Pilots Ass’n v. FAA*, 3 F.3d 449, 450 (D.C. Cir. 1993) (finding agency conclusion arbitrary and capricious because it was internally inconsistent with other agency precedent and interpretations).

³⁰ Order, ¶ 52.

inconsistent with Section 20.18(n)(3), which already imposes a requirement that the CMRS provider transmit a bounce-back to areas where it does not provide text-to-9-1-1.³¹ Furthermore, the Order repeatedly cites to the Voluntary Agreement as a model,³² and readily acknowledges that the Agreement does not provide for text-to-9-1-1 while a subscriber is roaming,³³ but imposes the bounce-back obligation on serving providers anyway. Section 20.18(n)(7)'s inconsistency with the Order and Section 20.18(n)(3) thus counsels in favor of its elimination or modification.

Inconsistent with the CVAA. Finally, Section 20.18(n)(7) is inconsistent with the Commission's obligations under the CVAA. Insofar as the FCC relies on Section 106(g) of the CVAA as the principal basis for the rule,³⁴ Section 20.18(n)(7) does not meet this provision's requirement that regulations be "achievable and technically feasible." As outlined above, the record in this proceeding does not show that a roaming obligation on the part of the serving provider to send a bounce-back message is technically feasible. Moreover, the Commission's Emergency Access Advisory Committee (EAAC) acknowledged the SMS network architecture and routing issues that preclude the serving carrier from initiating a bounce-back message.³⁵

³¹ See *supra* p. 6.

³² See, e.g., Order ¶¶ 30, 42, 55.

³³ Order, ¶ 70.

³⁴ Order, ¶ 100 n.273 (citing 47 U.S.C. § 615c(g) ("The Commission shall have the authority to promulgate . . . other regulations, technical standards, protocols and procedures . . . where achievable and technically feasible")) (emphasis added).

³⁵ EAAC March 2013 Text Messaging Report at 10 (reporting that "in inter-carrier domestic or international roaming situations, SMS-to-9-1-1 cannot, at this point, be supported...").

Accordingly, the rule is inconsistent with the CVAA's command that adopted regulations be achievable and technically feasible.

IV. CONCLUSION

CTIA and its member companies have long collaborated with interested stakeholders to make wireless 9-1-1 services available to the public, including some service providers' voluntary commitment to make interim text-to-911 services available to their subscribers. Further, the wireless industry has dedicated substantial resources to developing innovative 9-1-1 services and text-to-9-1-1 deployment. While CTIA and its member companies will no doubt continue to lead the charge in providing the public with access to emergency communications when they need them most, CTIA believes that Section 20.18(n)(7) bears careful reconsideration. Importantly, the relief CTIA requests seeks only to realign carriers' responsibilities with technical realities and would have no practical impact on consumers. By assuring that the rules

reflect current network architectures, the Commission will help further its goal of effective implementation of text-to-9-1-1 services for all wireless subscribers.

Respectfully submitted,

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