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

In the Matter of	)	
	)	
Numbering Policies for Modern Communications	)	WC Docket No. 13-97
	)	
	)	WC Docket No. 04-36
IP-Enabled Services	)	
	)	WC Docket No. 07-243
Telephone Number Requirements for IP-Enabled Services Providers	)	CC Docket No. 95-116
	)	
Telephone Number Portability	)	CC Docket No. 01-92
	)	
Developing a Unified Intercarrier Compensation Regime	)	WC Docket No. 10-90
	)	
Connect America Fund	)	CC Docket No. 99-200
	)	
Numbering Resource Optimization	)	
	)	
Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources	)	
	)	
Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules	)	

INITIAL COMMENTS OF THE TEXAS 9-1-1 ENTITIES

July 19, 2013

The Texas 9-1-1 Alliance,[1] the Texas Commission on State Emergency Communications,[2] and the Municipal Emergency Communication Districts Association[3] (collectively, "the Texas 9-1-1 Entities") respectfully submit the following brief initial comments to the Federal Communications Commission ("Commission") Notice of Proposed Rulemaking ("NPRM"), Order and Notice of Inquiry ("NOI") in the above-referenced proceedings.[4]

These initial comments are limited to the legacy 9-1-1 issues potentially raised by the NOI associated with the geographic boundaries of number administration. The NOI provides, in relevant part:

> We seek comment on whether removing geographic boundaries from number administration could raise new public safety concerns associated with 911 call routing and provision of location information. If geographically-based number administration were to be eliminated, we seek comment on what if any mechanisms would be needed in order to ensure that emergency service is timely and accurately provided. How would a shift away from rate-center bounded

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[1] The Texas 9-1-1 Alliance is an interlocal cooperation entity composed of 24 Texas Emergency Communication Districts with E9-1-1 service and public safety responsibility for approximately 53% of the population of Texas. These emergency communication districts were created pursuant to Texas Health and Safety Code Chapter 772 and are defined under Texas Health and Safety Code § 771.001(3)(B).

[2] The Texas Commission on State Emergency Communications ("CSEC") is a state agency created pursuant to Texas Health and Safety Code Chapter 771, and is the State of Texas' authority on emergency communications. CSEC administers the Texas state 9-1-1 program under which 9-1-1 service is provided through the state's 24 regional planning commissions to approximately two-thirds of the geography and one-third of the population of Texas.

[3] The Municipal Emergency Communication Districts Association is an association of 26 municipal emergency communication districts, as defined under Texas Health and Safety Code § 771.001(3)(A), that are located primarily in the Dallas-Fort Worth area.

[4] *Numbering Policies for Modern Communications; IP-Enabled Services; Telephone Number Requirements for IP-Enabled Services Providers; Telephone Number Portability; Developing a Unified Intercarrier Compensation Regime; Connect America Fund; Numbering Resource Optimization; Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources; Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules*, WC Docket Nos. 13-97, 04-36, 07-243, 10-90, CC Docket Nos. 95-116, 01-92, 99-200, Notice of Proposed Rulemaking, Order and Notice of Inquiry, 28 FCC Rcd 5842 (rel. Apr. 18, 2013).

> numbering impact E911 and NG911 efforts, and how could the Commission administer its numbering policy in a manner that enhances these important efforts?[5]

The wireline service 9-1-1 issues associated with legacy 9-1-1 selective routers and legacy 9-1-1 databases are well recognized and documented in Commission rule and industry reports.[6] Nothing has changed related to these legacy 9-1-1 issues in the context of wireline service.

As the Texas 9-1-1 Entities stated in their 2003 filing, "[w]hile porting a wireline carrier telephone number to a wireless carrier outside the constraints of the rate center(s), 9-1-1 tandem(s), and 9-1-1 database(s) may be feasible, porting that same telephone number back to a wireline carrier or between wireline carriers must still abide by the existing rate center(s), 9-1-1 tandem(s) and/or 9-1-1 database(s) constraints needed to maintain proper E9-1-1 services in a local number portability environment for wireline E9-1-1 services."[7] Similarly, interim transitional aspects of NG9-1-1 also rely on legacy 9-1-1 infrastructure.[8] Accordingly, there should be no expansion of geographic number portability boundaries for wireline service until

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[5] NOI at ¶126.

[6] 47 C.F.R 52.26(a):

> Local number portability administration shall comply with the recommendations of the North American Numbering Council (NANC) as set forth in the report to the Commission prepared by the NANC's Local Number Portability Administration Selection Working Group, dated Apr. 25, 1997 (Working Group Report) and its appendices, which are incorporated by reference pursuant to 5 U.S.C. 552(a) and 1 CFR part 51. Except that: Section 7.10 of Appendix D and the following portions of Appendix E: Section 7, Issue Statement I of Appendix A, and Appendix B in the Working Group Report are not incorporated herein.

In the Working Group Report, Appendix D provides in relevant part:

> LNP Portability Boundary - If location portability is ordered by a state commission in the context of Phase I implementation of LRN, location portability is technically limited to rate center/rate district boundaries of the incumbent LEC due to rating/routing concerns. Additional boundary limitations, such as the wire center boundaries of the incumbent LEC may be required due to E911 or NPA serving restrictions and/or regulatory decisions.

[7] CC Docket. No. 95-116, Comments of the Texas Commission on State Emergency Communications and Texas Emergency Communication Districts (Feb. 26, 2003).

[8] See, NENA NG9-1-1 Transition Plan Considerations, NENA 77-501, v1, Feb. 24, 2011 at p. 57 ("Legacy Emergency Call Transition Considerations") (available at http://www.nena.org/general/custom.asp?page=NG911_TransitionPlng).

such time as all wireline service providers can (1) deliver 9-1-1 calls via Session Initiation Protocol ("SIP") to the Next Generation 9-1-1 ("NG9-1-1") Border Control Function ("BCF") and (2) can deliver associated location information as part of 9-1-1 call delivery concurrently with full transition from the legacy 9-1-1 system infrastructure to the NG9-1-1 infrastructure.

The Texas 9-1-1 Entities appreciate the opportunity to provide these initial comments, and respectfully request that the Commission take action consistent with these initial comments.

Respectfully submitted,

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