

September 26, 2013

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *In the Matter of Facilitating the Deployment 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*

Dear Ms. Dortch:

On September 25, 2013, Brian Josef and Matthew Gerst of CTIA-The Wireless Association® (“CTIA”), spoke via telephone with David Furth of the Public Safety and Homeland Security Bureau regarding issues relevant to the above-listed proceeding and CTIA’s Petition for Reconsideration, or in the Alternative, for Clarification (“Petition”) of the Commission’s rules regarding a text-to-9-1-1 “bounce-back” notification.¹ As previously noted, the relief CTIA’s *Petition* requests will *not* prevent consumers who are roaming from receiving the bounce-back messages. CTIA’s *Petition* seeks simply to ensure that the Commission’s rules assign responsibilities to carriers in a manner that reflects technical realities.

During the conversation, CTIA addressed the Commission’s proposed amendment of Section 20.18(n)(7) in response to CTIA’s *Petition*. CTIA noted that any clarification of the home network and host network provider’s respective obligations to support a “bounce back” notification to a consumer who sends a text message to 9-1-1 while roaming on a host provider’s network must account for the technical realities of the existing SMS network architecture. Specifically, CTIA recommended that a covered home network text provider’s obligation to provide any bounce back message should account for whether the home network operates “in the area” that a consumer initiates the text-to-911, and not only whether the covered home network text provider supports text-to-911 services at that time.

CTIA also noted the technical infeasibility of any obligation that the covered text provider host network “transmit” the text-to-911 of a consumer roaming on the host network to the covered text provider home network and the home network’s responding “bounce back” message due to the store-and-forward nature of CMRS provided SMS services.² For

¹ Petition for Reconsideration, or in the Alternative, for Clarification of CTIA–The Wireless Association®, PS Docket No. 11-153, PS Docket No. 10-255 (June 28, 2013) (“Petition”)

² Emergency Access Advisory Committee (“EAAC”), *Report of Emergency Access Advisory Committee (EAAC) Subcommittee 1 on Interim Text Messaging to 9-1-1* (March 1, 2013) (“EAAC March 2013 Text Messaging Report”).

this reason, CTIA recommended that any rule ensure that the covered text provider host network not “impede” a consumer’s text-to-911 initiated while roaming on the host network and the responding “bounce back” message from the home network.

Further, CTIA notes that the technical feasibility of a home network’s ability to locate a consumer who is roaming on a host network in order to provide a “bounce back” message when text-to-911 is unavailable remains an open question. Notably, the FCC has tasked the Communications Security, Reliability and Interoperability Council (“CSRIC”) to study and report on the *technical feasibility* for wireless carriers to include E911 Phase 2 location accuracy and information in texts sent to 9-1-1 and make recommendations for including enhanced location information in texts to 9-1-1.³ CTIA stands ready to work with the CSRIC to consider this issue and notes the additional challenges of location determination of texts to 9-1-1 in the roaming context.

Given the impending September 30, 2013 compliance deadline, CTIA respectfully requests that the Commission move swiftly to issue any amendments to Section 20.18(n)(7) in a manner that addresses CTIA’s *Petition* and consistent with the suggestions herein. Such amendments would prevent the Commission from imposing a technically infeasible requirement on wireless carriers, while still promoting the Commission’s goal of making a bounce-back message available to roaming wireless consumers.

Pursuant to Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office. Please direct any questions to the undersigned.

Sincerely,

/s/ *Brian M. Josef*

Brian M. Josef
Assistant Vice President – Regulatory Affairs
CTIA – The Wireless Association®

cc: David Turetsky
David Furth

³ CSRIC IV Working Group Descriptions and Leadership *available at* http://transition.fcc.gov/bureaus/pshs/advisory/csr4/CSRIC_%20IV_Working_Group_Descriptions_%2009122013.pdf (last visited Sept. 26, 2013).