

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 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 OF CABLE & COMMUNICATIONS CORPORATION, D/B/A MID-RIVERS
WIRELESS FOR LIMITED WAIVER OR CLARIFICATION OF SECTION 20.18(n)(7)
OF THE COMMISSION’S RULES**

Submitted September 30, 2013

Cable & Communications Corporation (“C&CC”), d/b/a/ Mid-Rivers Wireless, pursuant to Section 1.3 of the Federal Communications Commission’s (“Commission’s”) rules,¹ respectfully requests a limited waiver or clarification of the requirement contained in Section 20.18(n)² of the Commission’s rules. Specifically, C&CC requests a waiver or clarification only of Section 20.18(n)(7),³ which requires C&CC to “provide an automatic bounce-back message to any consumer roaming on its network who sends a text message to 911.”

C&CC currently provides bounce-back messages to its own subscribers who may send a text to 911, advising them that: *“There is no text-to-911 service available. Make a voice call to 911 or use another means to contact emergency services.”*

¹ 47 C.F.R. § 1.3

² 47 C.F.R. § 20.18(n)

³ 47 C.F.R. § 20.18(n)(7)

However, it is not technically feasible at this time for C&CC to generate these bounce-back messages to the customers of other carriers roaming on its network. As indicated in the attached letter from The Hyde Company (SPATCH), the company providing C&CC's Short Message Service (SMS, or "texting,"), all text messages – including text messages sent to 911 – are routed directly to the home carrier's Message Center (MC), whether those messages originate on the carrier's home network or a foreign (roaming) network.

On June 28, 2013, CTIA – The Wireless Association (CTIA) submitted to the Commission a Petition for Reconsideration in the above-captioned proceedings involving roaming requirements.⁴ This petition clearly points out that the Commission's Text-to-911 requirements are not currently technically feasible in a roaming environment. NTCA – The Rural Broadband Association (NTCA), of which C&CC's parent company is a member, filed comments supporting CTIA's petition.⁵ Other wireless providers including AT&T, T-Mobile, SRT Wireless, i wireless, and others have also filed similar comments and petitions for waiver on this issue. Each of these comments and petitions reference and provide details supporting the fact that it is not currently technically feasible for the serving carrier to provide the bounce-back message in the roaming context, and that bounce-back messages may only be generated by the home carrier.

⁴ PETITION FOR RECONSIDERATION, OR IN THE ALTERNATIVE, FOR CLARIFICATION OF CTIA – THE WIRELESS ASSOCIATION®, *In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*, PS Docket No. 11-153, and *Framework for Next Generation 911 Deployment*, PS Docket No. 10-255, Submitted June 28, 2013.

⁵ Reply to Oppositions of Petition for Reconsideration of NTCA – The Rural Broadband Association, *In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*, PS Docket No. 11-153, and *Framework for Next Generation 911 Deployment*, PS Docket No. 10-255, Submitted August 26, 2013.

The Commission specified in its May 8, 2013 Report and Order⁶ that “covered providers who are unable to implement the bounce-back requirement by September 30, 2013 should file a request for waiver.” As it is currently technically infeasible for C&CC as the serving carrier to generate bounce-back text messages to roamers as mandated by Rule Section 20.18(n)(7), and it is also technically infeasible for C&CC (which operates a wireless network of approximately 40 tower sites and serves less than 2,000 end-user wireless customers in an extremely rural area) to even attempt to implement a stand-alone solution for providing this type of service within the existing wireless network architecture. C&CC will therefore find it impossible to comply with this specific rule, and believes it is necessary at this time to request a waiver or clarification of this rule.

C&CC respectfully requests that the Commission grant it a limited waiver of Section 20.18(n)(7) of the Commission’s rules, or, in the alternative, provide clarification that C&CC is not required to comply with the rule section requiring the provision of bounce-back messages to customers of other carriers roaming on its network.

Respectfully submitted,
CABLE & COMMUNICATIONS CORPORATION
D/B/A/ MID-RIVERS WIRELESS

By: 
Bill Wade, General Manager
904 C Avenue, PO Box 280, Circle, MT 59215

⁶ FCC 13-64, *In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*, PS Docket No. 11-153, and *Framework for Next Generation 911 Deployment*, PS Docket No. 10-255, Para. 62.



"Gets the Message Out"

Cable & Communications Corporation

Bill Wade, General Manager

PO Box 280

Circle, MT 59215

September 27, 2013

Dear Bill,

With current wireless technology text messages (SMS), including messages with a destination address of 911, are routed directly to the home carriers message Center (MC) weather they originate locally or from a foreign network. Since text messages from subscribers of other carriers roaming on a network are routed directly back to the home carriers MC, the MC of the servicing carrier does not have access to that traffic and thus can not provide any kind of response or other processing.

The technology to implement this kind of functionality would require modifications to the switching network to allow for the detection and routing of a specific destination address to the local MC. To the best of our knowledge, this capability is not commercially available.

Sincerely,

A handwritten signature in black ink, appearing to read "John P. Cuches Jr.", written over a white background.

John P. Cuches Jr.
President