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Washington, DC 20004

October 1, 2013

Mr. David Turetsky
Chief, Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Status of T-Mobile's Implementation of Voluntary Text-to-911 Commitment

Dear Mr. Turetsky:

On December 6, 2012, T-Mobile USA,¹ along with the three other nationwide wireless carriers, made a voluntary commitment to provide interim text-to-911 service by May 15, 2014.² As part of this undertaking, T-Mobile agreed to provide the Commission with quarterly status updates regarding its efforts on the deployment of a national text-to-911 capability³ and on July 1, 2013,⁴ T-Mobile provided the first of such updates. Today, T-Mobile is providing its second status report.⁵

Technical Coordination. T-Mobile continues to be enthusiastically engaged with various stakeholders as it works to ensure it meets its May 15, 2014, commitment. T-Mobile is actively involved with the joint Alliance for Telecommunications Industry Standards (“ATIS”)/Telecommunications Industry Association’s (“TIA”) work on text-to-911. For example, T-Mobile has been a contributing member in efforts to supplement the ATIS/TIA text-to-911 standard that was originally approved in March 2013.⁶ T-Mobile has also participated in

¹ T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

² See Letter of APCO International (“APCO”), NENA – The 9-1-1 Association (“NENA”), AT&T, Sprint Nextel, T-Mobile USA and Verizon to Chairman Genachowski and Commissioners McDowell, Clyburn, Rosenworcel and Pai, PS Docket No. 10-255, 11-153 (filed December 6, 2012)(“Text-to-911 Commitment Letter”)

³ *Id.* at 2.

⁴ Letter from Steve B. Sharkey, T-Mobile, to David Turetsky, Chief, Public Safety and Homeland Security Bureau, FCC, PS Docket Nos. 10-255 & 11-153 (July 1, 2013).

⁵ Pursuant to its commitment, T-Mobile is also providing copies of this report to NENA and APCO.

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

ATIS efforts regarding text-to-911 implementation. Furthermore, T-Mobile is an active member of the National Emergency Number Association's (NENA) Short Message Service (SMS) Text Service Coordination Group. This NENA initiative is focused on identifying common text-to-911 implementation milestones and the stakeholders responsible for them, developing educational material, and putting together a text-to-911 planning guide.

Vendor support and connectivity. T-Mobile continues to work with its text-to-911 text control center vendor as it designs and tests a production configuration in accordance with the *Joint ATIS/TIA Native SMS to 9-1-1 Requirements and Architecture Specification*, J-STD-110 standard.⁷ T-Mobile plans to begin laboratory testing in October 2013. Additionally, T-Mobile is in the process of identifying suitable Public Safety Answering Point partner(s) with whom to conduct First Office Application testing. The goal is to complete this effort by the end of 2013.

Consumer Outreach. Consistent with its commitment, T-Mobile provides a bounce-back message to any of its customers who attempt to send an SMS message to 911 and has done so since January 2012. The message is consistent with May 2013 Text-to-911 Report and Order that requires the bounce-back message to include language that states text-to-911 is unavailable and that the consumer should try another method to contact emergency services.⁸ In September 2013, T-Mobile implemented a similar bounce-back message for consumers that attempt to send messages to 911 via Multimedia Messaging Service, which is also consistent with the Commission's order.⁹ Finally, T-Mobile continues to work with Commission and other stakeholders to educate the public about the capabilities of text-to-911 in order to set appropriate consumer expectations.

Other. T-Mobile continues to integrate MetroPCS customers into the T-Mobile network. MetroPCS subscribers currently receive the same bounce-back message that T-Mobile subscribers receive when they attempt to send an SMS message to 911.¹⁰ In addition, MetroPCS subscribers buying new GSM/UMTS devices will receive the same text-to-911 service as T-Mobile subscribers.

Conclusion. T-Mobile is pleased to continue reporting that it is on track to meeting the voluntary commitment it made to provide text-to-911 service nationally by May 15, 2014.

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⁷ See *id.*

⁸ *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, Framework for Next Generation 911 Deployment*, Report and Order, 28 FCC Rcd. 7556, ¶ 69 (2013).

⁹ See *id.* ¶ 110 n. 294.

¹⁰ T-Mobile did not acquire the MetroPCS network until May 1, 2013. The MetroPCS network was not a T-Mobile network at the time it made its voluntary commitment in December 2012, and is therefore not covered by that commitment.

Please do not hesitate to contact me at (202) 654-5918 if you or your staff should have any questions.

Respectfully,

/s/ Steve B. Sharkey

Steve B. Sharkey
Director, Chief Engineering and Technical Policy,
Federal Regulatory

cc: David Furth, Deputy Chief, PSHSB
Derek Poarch, APCO International
Brian Fontes, NENA – The 911 Association