



H. Russell Frisby, Jr.  
1775 Pennsylvania Avenue, NW, Suite 800  
Washington, DC 20006-4605  
202.572.9937 DIRECT  
202.572.9945 DIRECT FAX  
RFrisby@stinson.com

December 11, 2013

**VIA ELECTRONIC MAIL**

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

Re: Notice of Ex Parte Communication: Discussion of Over-the-Top Text  
Messaging Solutions to support Text-to-911 (PS Docket Nos. 11-153, 10-255)

Dear Ms. Dortch:

This is to notify you pursuant to Section 1.1206 of the Commission's Rules that on December 9, 2013 Timothy Lorello, Senior Vice President and Chief Marketing Officer, and Thomas Ginter, Vice President of Safety and Security Group, both of TeleCommunication Systems, Inc. ("TCS") met with David Furth, Nicole McGinnis (via phone), Tim May, David Siehl, Behzad Ghaffari, Yoon Chang, and Dana Zelman (via phone) of the Commission's Public Safety and Homeland Security Bureau, and Henning Schulzrinne of the Commission's Office of Strategic Planning & Policy Analysis, to discuss the above-referenced topic on Over-the-Top ("OTT") Messaging solutions for Text-to-911. Don Mitchell, Director of Product Architecture, and Roger Marshall, Senior Member of the Technical Staff, both of TCS, attended by phone

TCS' representatives discussed the how OTT providers could support the ability to deliver Text-to-911 messages using existing SMS-to-911 infrastructure. TCS presented an overview of the OTT ecosystem and compared OTT solutions with SMS technology, showing pros and cons to the respective technologies in the context of delivering text messages to Public Safety Answering Points ("PSAPs") in support of 9-1-1 requests for help. TCS also discussed the ATIS-defined SMS-to-911 standard in light of OTT messaging approaches.

In these discussions, TCS identified challenges associated with delivering OTT messages into the existing Text Control Centers that are currently responsible for delivering SMS messages to PSAPs. Identifying the location of the OTT texter was described as the greatest challenge, and various location technologies currently in use for wireless E9-1-1 were explained. The conclusion drawn by TCS, and the recommendation suggested, is that OTT messaging providers could interface with the existing SMS-to-911 infrastructure by relying upon native SMS interfaces available on the majority of mobile smartphones that currently support OTT messaging applications.

Given the reliance upon existing SMS infrastructure and the possibility, in the far future, that such infrastructure might evolve or be eliminated, TCS also recommended that other long-term approaches continue to be explored but noted that using native SMS interfaces for commercial messaging is already in use and that such approaches could be adapted for use by OTT messaging providers.

The attached materials were left behind. Please contact me if you have any questions.

Sincerely,

**STINSON MORRISON HECKER LLP**

*/s/H Russell Frisby, Jr.*  
H. Russell Frisby, Jr.

*Counsel to TeleCommunication Systems, Inc.*

cc: David Furth  
Nicole McGinnis  
Tim May  
David Siehl  
Behzad Ghaffari  
Yoon Chang  
Dana Zelman  
Henning Schulzrinne