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Washington, DC 20004

December 20, 2013

Admiral David Simpson
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 Admiral:

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 and October 1, 2013,⁵ T-Mobile supplied two such updates. Today, T-Mobile is providing its third status report.⁶

Technical Coordination. T-Mobile continues to engage with various stakeholders as it works to meet 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. Not only did T-Mobile participate in the writing of the ATIS/TIA

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 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 (Oct. 1, 2013).

⁶ Pursuant to its commitment, T-Mobile is also providing copies of this report to NENA and APCO.

text-to-911 standard that was originally approved in March 2013,⁷ it has since that time been active in the development of an implementation standard⁸ as well as supplemental material for the original standard.⁹ 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 issues such as the identification of 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 deploys a production configuration in accordance with the *Joint ATIS/TIA Native SMS to 9-1-1 Requirements and Architecture Specification*, J-STD-110 standard.¹⁰ In this effort, T-Mobile conducted laboratory testing in October 2013. More importantly, T-Mobile implemented its first successful text-to-911 service with Montgomery County, NY, on November 20, 2013, and it remains operational. In Q1 2014, T-Mobile plans on rolling out text-to-911 with other select PSAPs that have requested it.

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.¹¹ 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.¹² Additionally, since June 2013, T-Mobile has included information on text-to-911 on its website.¹³ T-Mobile will continue 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.

⁷ ATIS/TIA, *Joint ATIS/TIA Native SMS to 9-1-1 Requirements & Architecture Specification*, J-STD-110 (2013) ("J-STD-110").

⁸ ATIS/TIA, *Joint ATIS/TIA Implementation Guidelines For J-STD-110, Joint ATIS/TIA Native SMS To 9-1-1 Requirements & Architecture Specification*, J-STD-110.01 (2013)

⁹ ATIS/TIA, *ATIS/TIA Supplement A to J-STD-110, Joint ATIS/TIA Native SMS to 911 Requirements & Architecture Specification*, J-STD-110.a (2013).

¹⁰ See J-STD-110.

¹¹ *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).

¹² See *id.* ¶ 110 n. 294.

¹³ T-Mobile, About T-Mobile > Company Information > 911, http://www.t-mobile.com/Company/CompanyInfo.aspx?tp=Abt_Tab_CompanySafety&tsp=Abt_Sub_911.

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 911.¹⁴ In addition, MetroPCS subscribers buying new GSM/UMTS devices will receive the same text-to-911 service as T-Mobile subscribers when that becomes available with respect to those PSAPs that have requested it.

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.

* * *

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
Sr. Director, Engineering and Technology Policy,
Federal Regulatory

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

¹⁴ 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.