

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Technology Transitions)	GN Docket No. 13-5
)	
AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition)	GN Docket No. 12-353
)	
Connect America Fund)	WC Docket No. 10-90
)	
Structure and Practices of the Video Relay Service Program)	CG Docket No. 10-51
)	
Telecommunications Relay Services And Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities)	CG Docket No. 03-123
)	
Numbering Policies for Modern Communications)	WC Docket No. 13-97
)	

**COMMENTS OF THE TEXAS 9-1-1 ENTITIES
ON THE COMMISSION'S DATA COLLECTION PROPOSAL**

The Texas 9-1-1 Alliance¹ and the Texas Commission on State Emergency Communications² (collectively, the "Texas 9-1-1 Entities") respectfully submit the following

¹ The Texas 9-1-1 Alliance is an interlocal cooperation entity composed of 25 Texas emergency communication districts with E9-1-1 service and public safety responsibility for more than approximately 60% of the population of Texas. These emergency communication districts were created pursuant to Texas Health and Safety Code Chapter 772 and are defined under Texas Health and Safety Code § 771.001(3)(B).

² The Texas Commission on State Emergency Communications ("CSEC") is a state agency created pursuant to Texas Health and Safety Code Chapter 771, and is the State of Texas' authority on emergency communications. CSEC administers the Texas state 9-1-1 program under which 9-1-1 service is provided through 23 regional planning commissions to approximately more than one-half of the geography and one-fourth of the population of Texas.

comments to the Commission's data collection proposal for ongoing data initiative in its Technology Transitions Order³ (the "Data Collection Proposal")

All-IP Next Generation 9-1-1 ("NG9-1-1") Trials

Initially, the Texas 9-1-1 Entities wish to comment on the Commission appropriately recognizing the importance of developing NG9-1-1 standards before facilitating trials to deploy an "all-IP" NG9-1-1 service. The Alliance for Telecommunications Industry Solutions ("ATIS") continues to make progress on NG9-1-1 standards.⁴ Therefore, in the near future it may be appropriate to have a NG9-1-1 trial on direct Internet Protocol ("IP") interconnection and with location being sent attendant to the 9-1-1 call. To date, the Commission has left IP interconnection to good faith negotiations between the involved stakeholders who will be required to interface directly via IP-to-IP to provide access to 9-1-1 service. However, such IP interconnection for providing access to 9-1-1 service has not yet happened anywhere nationwide to the best of our knowledge. As such, circumstances warrant the Commission's expedited attention, and specifically tracking for PSTN-to-IP NG9-1-1 Structured Observation purposes, whether and when PSAPs are receiving IP-based 9-1-1 calls from any service provider (e.g., Interconnected VoIP—fixed or nomadic, wireless, or wireline). Moreover, trials of IP-based 9-1-1 calls should be done well in advance of any final findings of fact, conclusions, and/or binding decisions on any issues associated with PSTN-to-IP transition.

³ *Technology Transitions et al.*, GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5, (rel. Jan. 31, 2014) ("Technology Transitions Order").

⁴ For example, *see* ATIS Standard ATIS-0700015 (ATIS Standard for Implementation of 3GPP Common IMS Emergency Procedures for IMS Origination and ESInet/Legacy Selective Router Termination, Version 1, published Mar. 17, 2013), and pending current revisions.

Voluntary NG9-1-1 Data Collection

In the Data Collection Proposal, the Commission emphasized the value of better data on ongoing NG9-1-1 deployments and seeks comment on ways to collect and make available data outside of experiments to facilitate NG9-1-1 deployments, while preserving and enhancing the enduring network value of public safety.⁵ Specifically, the Commission proposes to complement the data collection efforts of the National 9-1-1 Program Office and National Emergency Number Association (“NENA”) by “collecting data, on a voluntary basis, on NG911 progress from major commercial entities that are involved in NG911 implementation on a national scale, including carriers, 911 system service providers, and NG911 system vendors.”

Regarding its proposal, the Commission asks, *inter alia*, what precise information should be voluntarily collected from the vendor community, and whether there is information that the vendor community could voluntarily provide on a regular basis that could assist the Commission and other stakeholders in assessing IP transition and implementation of NG9-1-1?⁶ In addition to obtaining voluntary information from the vendor community, the Commission should encourage 9-1-1 authorities to likewise submit such data in order to obtain more complete data and in order to gather the experiences of both inextricably linked partners in providing 9-1-1 service. Some 9-1-1 authorities did exactly this in the context of providing voluntary ECaTs wireless 9-1-1 call data (instead of the ECaTs data coming from their contracted vendor) in the wireless location accuracy proceeding.⁷ Moreover, given the IP transition from Incumbent Local Exchange

⁵ Technology Transitions Order at ¶¶ 190 - 194.

⁶ Technology Transitions Order at ¶ 194.

⁷ *In the Matter of Wireless E9-1-1 Location Accuracy Requirements*, PS Docket No. 07-114, Third Further Notice of Proposed Rulemaking (rel. Feb. 21, 2014) at ¶ 19, footnote 41.

Companies with wholesale customer websites that include 9-1-1 interconnection information⁸ to other potentially deregulated alternative vendors and/or directly to 9-1-1 authorities providing some or all NG9-1-1 functions, 9-1-1 authorities may in fact be the more appropriate source of such additional voluntary data. The data from 9-1-1 authorities could also be cross-referenced with the annual 9-1-1 reliability and resiliency and alternatives measures data that the Commission will be receiving annually from Covered Service Providers pursuant to 47 C.F.R. §12.4.

9-1-1 authorities currently voluntarily work to verify data with the Commission (*i.e.*, through the PSAP Registry), with their service providers for Selective Routing (“SR”) and Automatic Location Information (“ALI”), and with wireless service providers and their third parties (through shape files for wireless carrier 9-1-1 call routing). 9-1-1 authorities also currently work to verify data with NENA and the National 9-1-1 Program Office. Therefore, it should not be too much of an extra imposition for 9-1-1 authorities to voluntarily verify data to provide some additional data to the Commission on the important topic of NG9-1-1 efforts, given that the means for facilitating much of the “better data” from 9-1-1 authorities currently exists: the Commission’s PSAP Registry.

The PSAP Registry could be expanded to include fields for the following:

- 1) 9-1-1 authority;
- 2) Provider's legacy SR, if in use, or date, or excepted date, if discontinued;
- 3) Provider's legacy ALI database, if in use, or date, or excepted date, if discontinued;
- 4) Planned date to make PSAP IP-reachable, and, current stage;
- 5) IP network connectivity to the PSAP and its bandwidth;

⁸ See, for example, AT&T CLEC Handbook, Guides and Technical Publications, including E9-1-1, available at <https://clec.att.com/clec/hb/shell.cfm?section=1398&hb=1151>; Verizon Global, Doing Business, Enhanced 9-1-1, available at <http://www22.verizon.com/wholesale/local/E911/enhanced-9-1-1.html>; Centurylink Wholesale, Access to Emergency Services (9-1-1/E9-1-1) version 28, available at <http://www.centurylink.com/wholesale/pcat/911.html>.

- 6) IP network for PSAP administrative purposes, provider, and type;
- 7) IP network for PSAP ALI retrieval, provider, and type;
- 8) IP network for PSAP call routing, provider, and type;
- 9) Diversity of IP access routes and whether there is more than one type of IP access route;
- 10) PSAP call-taker equipment supporting NG9-1-1 or is the software-upgradeable to NG9-1-1;
- 11) PSAP call-taker equipment supporting text-to-9-1-1 via web browser from multiple wireless carriers at the same time (if not using third-party aggregator) or via NG9-1-1 protocols (if Emergency Services IP Network (“ESInet”) NG9-1-1 network were available);
- 12) PSAP ALI query protocol, and its IP protocol;
- 13) Number of PSAPs on ESInet, approximate population served by ESInet, and geographic region of ESInet coverage;
- 14) Stage of ESInet deployment and date, or anticipated date, of production environment;
- 15) Availability of “native” NG9-1-1 or pre-NG9-1-1 interfaces to carriers;
- 16) Name of legacy network gateway provider and POI locations;
- 17) Name of border control function provider and POI locations;
- 18) Name of IP SR provider;
- 19) Name of ESRP provider;
- 20) Name of LVF provider;
- 21) Additional back ups;
- 22) Connections to other legacy SR via tandem-to-tandem or with other ESInets; and
- 23) To what extent, if any, have dispatch operations been integrated to the ESInet or using IP (if known).

It would also be helpful to categorize the specific data between PSAP NG9-1-1 IP capabilities, pre-NG9-1-1 IP capabilities, ESInet capabilities, and ESInet NG9-1-1 capabilities. Combined, the foregoing additional information would provide a status report of PSAP’s transition to IP and thus to NG9-1-1 service. By way of example for the Commission and other stakeholders to assess potential usefulness, the Appendix to these comments picks three PSAPs from the Commission PSAP Registry (one each from three different 9-1-1 authorities in Texas) and voluntarily provides the readily available information for each of the above categories.

Conclusion

The Texas 9-1-1 Entities appreciate the opportunity to provide Comments on the Data Collection Proposal, and respectfully request that the Commission take action on these matters consistent with these comments.

Respectfully submitted,



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Appendix

[See separate Excel file.]