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ATTORNEYS AT LAW

March 18, 2014

Ex Parte

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

Re: *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment*, PS Dockets No. 11-153 & 10-255

Dear Ms. Dortch:

On March 13, 2014, Steve Sharkey, Eric Hagerson, Peter Schlicting, and Jeff Hall of T-Mobile USA, Inc. (“T-Mobile”) and I, on behalf of T-Mobile, spoke telephonically with David Furth, Erika Olsen, Nicole McGinnis, David Siehl, Eric Ehrenreich, and Tim May, all of the Public Safety and Homeland Security Bureau regarding the above-referenced proceeding. The T-Mobile participants provided an update of T-Mobile’s implementation of text-to-911 in accordance with T-Mobile’s voluntary commitment to have text-to-911 available by May 15, 2014 to PSAPs that are capable of, and request to receive, text-to-911 service.¹

To date, T-Mobile has received 19 requests covering approximately 84 PSAPs. These PSAPs have chosen a variety of vendors and solutions. Last November, T-Mobile conducted its First Office Application for the TCS GEM client in Montgomery County, NY, and is working to turn up other PSAPs that are utilizing the same solution by the end of March, 2014. T-Mobile is well on its way to being able to have text-to-911 service available to requesting, capable PSAPs by May 15, 2014.

One potential impediment to timely implementation of text-to-911 for all currently requesting PSAPs is the lack of interconnection between the Text Control Centers (“TCC”) operated by different TCC vendors. Lack of interconnection – which was provided for in industry standards and is described in the Interim SMS Text-to-911 Planning Guide – means that

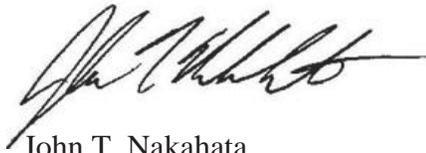
¹ Letter from Terry Hall, APCO International, Robert W. Quinn, Jr., AT&T, Barbara Jaeger, NENA – The 9-1-1 Association, Charles W. McKee, Sprint Nextel, Kathleen O’Brien Ham, T-Mobile USA, Kathleen Grillo, Verizon, to Chairman Genachowski, Commissioner McDowell, Commissioner Clyburn, Commissioner Rosenworcel and Commissioner Pai, PS Dockets No. 11-153 & 10-255 (filed December 6, 2012).

a CMRS provider must connect to multiple TCCs in order to deliver texts to all PSAPs. It is critical that these TCCs interconnect: “When TCCs from different vendors are able to interoperate with each other, PSAPs can connect to multiple carriers through a single TCC.”² The same is true in reverse: when TCCs from different vendors interconnect, a CMRS provider can reach multiple vendors’ PSAPs through a single TCC. TCC interconnectivity is therefore part of the revised ATIS standard for text-to-911.³ Without interconnection between TCCs, T-Mobile will not be able to reach a substantial number of requesting PSAPs.

T-Mobile should not be forced to enter into agreements with multiple TCCs simply to create a temporary work-around. It is clear, should the Commission require all or a significant subset of text providers to provide text-to-911, beyond the four nationwide carriers that have made the voluntary commitment, that requiring all texting providers to connect directly to all TCCs is a solution that cannot feasibly scale. Thus, in order to support a widespread text-to-911 mandate, TCCs will have to interconnect. Rather than force cumbersome and costly work-arounds now, the much better solution is for the Commission to encourage TCCs to implement interconnection immediately, pursuant to the industry standards that the TCCs helped to develop. T-Mobile thus encouraged the Commission actively to facilitate a resolution of any impediments to interconnecting TCCs.

Please let me know if you have further questions.

Sincerely,



John T. Nakahata
Counsel to T-Mobile USA, Inc.

cc: David Furth
Erika Olsen
Nicole McGinnis
David Siehl
Eric Ehrenreich
Tim May

² Ad Hoc National SMS Text-to-911 Service Coordination Group, “Interim SMS Text-to-911 Information and Planning Guide, Version 1” (February 2014), *available at* http://c.ymcdn.com/sites/www.nena.org/resource/resmgr/Docs/SMS_Text_Info_and_Plannin g.pdf.

³ ATIS, *Supplement A to J-STD-110, Joint ATIS/TIA Native SMS to 9-1-1 Requirements and Architecture Specification*, J-STD-110.a (Nov. 2013).