

**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

**TEXAS 9-1-1 ENTITIES' COMMENTS
ON AT&T'S PROPOSAL FOR WIRE CENTER TRIALS**

The Texas 9-1-1 Alliance,¹ the Texas Commission on State Emergency Communications,² and the Municipal Emergency Communication Districts Association³ (collectively, "the Texas 9-1-1 Entities") respectfully submit the following comments in the above-referenced proceedings⁴ on AT&T's Proposal for Wire Center Trials.⁵

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 one-half of the geography and one-fourth of the population of Texas.

³ The Municipal Emergency Communication Districts Association is an association of 26 municipal emergency communication districts, as defined under Texas Health and Safety Code § 771.001(3)(A), that are located primarily in the Dallas-Fort Worth area.

⁴ *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").

⁵ *AT&T Proposal for Wire Center Trials et al.*, GN Docket No. 13-5 et al., (filed Feb. 28, 2014) ("AT&T's Trial Proposal").

The Texas 9-1-1 Entities agree that having Public Switched Telephone Network (“PSTN”) (*i.e.*, Time Division Multiplex or TDM) to Internet Protocol (“IP”) transition trials would be an appropriate forum for identifying and resolving many of the operational, technical and “enduring network value” issues, such as 9-1-1. Regarding 9-1-1 service generally, fundamental prerequisites for transitioning from the PSTN to IP must include: (1) identifying and resolving 9-1-1 call delivery and features in both an E9-1-1 and NG9-1-1 environment, the latter of which will ultimately be all-IP; and (2) ensuring no degradation in the existing level of 9-1-1 service and features, including Automatic Location Identification (“ALI”) and ALI features associated with traditional wireline telephone service (*e.g.*, displaying appropriate emergency responders as part of ALI display, also known as wireline Emergency Service Numbers (“ESNs”), and 9-1-1 selective transfer feature to such responders). Fully addressing these two fundamental prerequisites will greatly improve AT&T’s Trial Proposal.

A. PSTN-to-IP trials provide a critical opportunity for the Commission and interested stakeholders to resolve important NG9-1-1 issues prior to nationwide implementation of PSTN-to-IP transition.

AT&T’s Trial Proposal does not address how 9-1-1 service will work end-to-end in an all-IP interconnection environment via NG9-1-1. AT&T stated in its trial proposal that its Trial Wire Centers are connected to legacy PSAPs, and that it “does not include any plans to migrate those PSAPs off of the legacy system *as part of the trial.*”⁶ AT&T did indicate, however, that “were these PSAPs to green light a plan to migrate to NG911 after the Commission approves AT&T’s Trial Proposal, AT&T would be willing to provide the Commission with supplemental information that would reassure the Commission of AT&T’s intention to abide by the

⁶ AT&T’s Trial Proposal, Wire Center Trial Operating Plan at p. 22 (emphasis in original).

requirements of the *911 Network Reliability R&O*, including bringing the Commission up to date on any ‘alternative measures’ such a change might require.”⁷

PSTN-to-IP transition must ultimately include thoroughly vetting, testing, and conducting trials of at least some NG9-1-1 PSAPs (*i.e.*, end-to-end all-IP networks and NG9-1-1 location delivery and functions). While PSTN facilities may remain a critical component of 9-1-1 service for the foreseeable future, trials for PSTN-to-IP transition must consider and include NG9-1-1. If additional time is needed to thoroughly vet, test, and conduct trials of NG9-1-1 networks, then the affected parties should take the extra time before deciding any PSTN-to-IP transition issues that could have far-reaching impacts on public safety.

In explaining its aspirations for the trial proposal, AT&T makes a compelling case in favor of the importance of including the testing of NG9-1-1 PSAPs in the context of PSTN-to-IP transition trials. AT&T explains that: (1) “[e]xcluding particular customer segments and/or services (such as dedicated or wholesale services) from the trial will deprive the Commission, consumers, industry and others of important real-world experience needed to prepare for the IP transition;”⁸ (2) “we [AT&T] hope to come out of the trials with an actionable plan that we can utilize to continue this transition in our approximately 4,700 wire centers and across the country in order to meet our stated goal of completing the IP Transition by the end of 2020;”⁹ (3) “before the sunset of the PSTN, it will be common for 911 Service Providers to support both traditional E911 and NG911 services;”¹⁰ and (4) “these trials come not a moment too soon because they can

⁷ *Id.*

⁸ AT&T’s Trial Proposal at p. 13.

⁹ *Id.* at p. 12.

¹⁰ AT&T’s Trial Proposal, Wire Center Trial Operating Plan at p. 22.

be conducted while the existing circuit-switched infrastructure remains operational.”¹¹ On this last issue, AT&T identifies a disturbingly convincing real-world case for concern regarding assumptions as to the continued availability of the legacy 9-1-1 network via TDM and circuit switched technologies.¹²

Identifying how 9-1-1 emergency service will work end-to-end in an all-IP environment via NG9-1-1 and resolving technical, operational, and enduring network value issues in an all-IP environment is critically important. To date, the Commission has left IP interconnection for access to 9-1-1 to the good faith negotiations of the involved commercial stakeholders who will be required to interface directly via IP-to-IP to provide access to 9-1-1 emergency services for their end user consumer customers. But IP interconnection for providing access to 9-1-1 emergency service has not, to our knowledge, happened yet anywhere nationwide. Accordingly, circumstances warrant the Commission’s expedited attention to IP interconnection for 9-1-1 access by facilitating potential trials well in advance of final binding decisions on any issues associated with PSTN-to-IP transition, including timing. Relying on existing legacy TDM and circuit switched technologies (as pointed out in AT&T’s Trial Proposal) may not be the prudent approach. Therefore, as soon as feasible and before making any final decisions on PSTN-to-IP

¹¹ AT&T’s Trial Proposal at p. 5.

¹² *Id* at p. 4 (“[M]anufacturers want to focus their businesses on the networks of the future, not technology that is being displaced, and so they are discontinuing production of TDM equipment. As a result, it is becoming increasingly difficult to obtain needed spare parts to keep legacy TDM networks going. Indeed, as strange as it may seem, AT&T has had to turn to Ebay to locate spare parts for its TDM network. At the same time, much of the workforce with the expertise to support TDM networks and services has retired or is nearing retirement, and those who are replacing them have no interest in becoming experts in yesterday’s technology. To the contrary, the best and the brightest minds emerging from our nation’s leading engineering universities are focused on IP technologies, the technologies of the future. In short, the IP-transition is well past the tipping point, and at some point in the not-too-distant future it will no longer be possible to maintain traditional TDM-based telephone networks and services. The demand won’t be there, the economics won’t support it, and the parts and labor to keep these networks going will not be available.”).

transition, there should be NG9-1-1 transition trials that include all IP interconnection for access to 9-1-1, with location being sent with the 9-1-1 call.

B. PSTN-to-IP transition must not result in the degradation of the enduring network value of 9-1-1 service and must enable the full promise of NG9-1-1 nationwide.

AT&T's Trial Proposal suggests that its Wireless Home Phone product with a new ALI enhancement will "emulate the wireline 911 experience."¹³ In the absence of any notice or requirement from regulators to do so, AT&T should be commended for voluntarily seeking to add an ALI enhancement to its Wireless Home Phone product. AT&T's proposal to add an ALI enhancement in the form of a civic address may ultimately allow for the deletion of the following statement from its Wireless Home Phone product offering: "For emergency calls, you may have to provide your location address to the 911 operator."¹⁴ Depending on the answers to fundamental questions, however, AT&T's proposal to add an ALI enhancement may be unacceptable as a replacement product for traditional legacy wireline PSTN service. This is especially the case if it perpetuates the broadband divide between urban and rural areas, where broadband products such as AT&T U-verse service are not available. Moreover, the status of broadband infrastructure in rural areas as a necessary part of achieving NG9-1-1 for PSTN-to-IP transition should not be underestimated.¹⁵

Texas 9-1-1 Entities have previously taken the position in other Commission proceedings that:

[N]ot using wireline ESNs for fixed-location callers inappropriately degrades current 9-1-1 service for fixed-location callers because the Automatic Location Identification ("ALI") that is displayed at the PSAP (1) does not identify the appropriate responders for law, fire, and EMS; (2) does not support current

¹³ *Id.* at 21.

¹⁴ http://www.att.com/shop/wireless/devices/att/wireless-home-phone-silver.html#fbid=S38n_eOdmMz.

¹⁵ For details on broadband status availability in Texas, see <http://www.connectedtx.org/interactive-map>.

functionality of the selective router for one-button transfers to secondary PSAPs; and (3) precludes the alternate routing of 9-1-1 calls in contingency situations based on the ESN of the caller.¹⁶

This position is fully consistent with the Commission's expressed long-term goal of providing public safety a "dispatchable address."¹⁷ Part of presenting a "dispatchable address" in wireline 9-1-1 service is reflecting the appropriate emergency responders as part of the PSAP Call-Taker's ALI screen instead of the non-specific "verify, verify, verify" currently used for wireless 9-1-1 service. In Texas, Interconnected VoIP service providers utilizing the third-party services of VoIP Positioning Centers are required by rule to provide, *inter alia*, wireline ESN equivalency and the appropriate emergency responders by using pseudo automatic number identifications (pANIs) set up and provisioned to display this ALI feature information to the PSAP Call-Taker's ALI screen.

As the nation's communications infrastructure goes through "transformative changes . . . at an extraordinary pace,"¹⁸ it is vital that PSTN-to-IP transition not compromise or degrade the historical progress in public safety. The future as embodied in NG9-1-1 must be secured. To determine whether and to what extent AT&T's Trial Proposal would indeed emulate wireline

¹⁶ *In the Matter of Framework for Next Generation 911 Deployment*, PS Docket No. 10-255, Joint Reply Comments of the Texas Commission on State Emergency Communications and the Texas 9-1-1 Alliance (Mar. 14, 2011).

¹⁷ *In the Matter of Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Third Further Notice of Proposed Rulemaking (rel. Feb. 21, 2014) at ¶ 118 ("Over the long term, we seek comment on how to formulate requirements that would require sufficiently granular location information to provide PSAPs with "dispatchable" address information, which would include a building address as well as specific floor and suite/room number information for indoor calls. We seek comment on this goal, including its costs and benefits. We also seek comment on what technologies might facilitate the delivery of dispatchable address information, and within what timeframe. We also seek comment on what future location-based solutions and NG911 technologies may make the provision of dispatchable address information easier. In the following sections, we seek comment on ways in which we can take steps towards achieving our long-term indoor location objectives.").

¹⁸ AT&T's Trial Proposal at p. 3.

9-1-1 service, degrade wireline 9-1-1 service or sufficiently improve AT&T's Wireless Home Phone product, depends on AT&T's answers to the following questions:

- 1) Would the proposed ALI enhancement be able to use wireline ESNs that enable having wireline English Language Translations ("ELTs"), as being done today in Texas by traditional wireline CLECs and by service providers using dynamic pANI solutions for E9-1-1 (e.g., Comcast, Time Warner Cable, Vonage, magicJack), instead of the wireless ELTs of "Verify, Verify, Verify" to be comparable to wireline 9-1-1 service features traditionally provided as part of AT&T legacy wireline TDM service? If not, why not? What are the potential competitive parity and disclosure issues associated with the proposed ALI enhancement, given that minimum 9-1-1 service requirements for CLECs via state public utility commissions and minimum 9-1-1 service disclosure requirements under the Commission's Interconnected VoIP rules are based on not degrading 9-1-1 service to consumers, in the case of CLECs, and disclosing 9-1-1 service variations to consumers, in the case of Interconnected VoIP?
- 2) Would the proposed ALI enhancement be provided as an addition to the x and y coordinates, in place of the coordinates, or would it be optional for the PSAPs to decide if they want to receive both?
- 3) What would be the proposed Class of Service indicator in the ALI display when a consumer calls from their home using the Wireless Home Phone product?
- 4) Given that the date of the proposed deployment is not public information yet, how much advance notice will the PSAPs receive prior to turning up the proposed ALI enhancement?
- 5) Is it contemplated that at some point in the future wireless-only households without the adapter for Wireless Home Phone service may also be able to use the ALI enhancement when they are at their home address?
- 6) Would the ALI address information be included in the Emergency Notification System ("ENS") data that is received monthly in Texas from the three VPCs for their service providers (e.g., Comcast, Time Warner Cable, Vonage, magicJack) in order to be comparable to traditional wireline ENS ALI information? If not, why not, and what parity and 47 U.S.C. 222(g) issues are implicated, given the ENS information requirements on CLECs and Interconnected VoIP providers?

- 7) When AT&T responded to the Commission's Question 38 in AT&T's March 26, 2014, Notice of Ex Parte filing about whether Wireless Home Phone Service will route to the same PSAP as the legacy POTS line,¹⁹ was AT&T indicating that it plans to route the 9-1-1 calls based on the "registered location" obtained in advance and available to AT&T as registered by the customer or was AT&T indicating that it plans to route these 9-1-1 calls the same way as other 9-1-1 wireless calls based on the pre-designated cell tower routing for all CMRS wireless 9-1-1 calls from that cell tower?

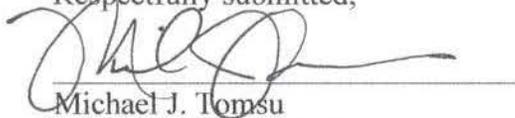
At a minimum, AT&T must provide answers to the above questions in order to enable the Commission and interested stakeholders to make fully informed decisions on these PSTN-to-IP transition issues before proceeding with PSTN-to-IP trials that could have potential far-reaching implications.

Conclusion

The Texas 9-1-1 Entities appreciate the opportunity to provide comments on AT&T's Trial Proposal, and respectfully request that the Commission take action on these matters consistent with these comments.

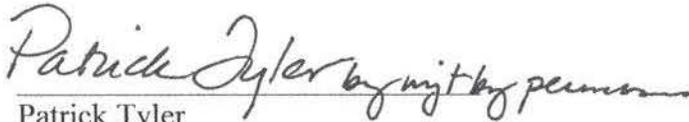
¹⁹ AT&T Notice of Ex Parte, GN Docket Nos. 13-5 and 12-353 (Mar. 26, 2014).

Respectfully submitted,



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