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COMMISSION ON STATE EMERGENCY COMMUNICATIONS
To Protect and Enhance Public Safety and Health

333 Guadalupe Street ★ Suite 2-212 ★ Austin ★ Texas 78701-3942

May 27, 2014

Marlene H. Dortch
 Secretary
 Federal Communications Commission
 445 12th Street, S.W.
 Washington, D.C. 20554

Received & Inspected

JUN 03 2014

FCC Mail Room

Re: *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No 94-102; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196; Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114; Framework for Next Generation 911 Deployment, PS Docket No. 10-255;*

Dear Ms. Dortch:

On May 22, 2014, Kelli Merriweather, Executive Director of the Texas Commission on State Emergency Communications (CSEC)¹ submitted via email a follow-up communication to Commissioner Ajit Pai and his Legal Advisor Brendan Carr regarding the Texas State 9-1-1 Program's survey of Multi-Line Telephone Systems (MLTS) in the rural areas of Texas. The email is set forth in its entirety as follows:

Dear Commissioner Pai,

During our meeting in March of this year, I mentioned that the Texas 9-1-1 Program was conducting a survey of MLTS systems in rural areas our state. We provided a report on this subject to our Commissioners on May 14th which you will find on page 57 of the meeting materials located at this [link](#).

To research the matter of accessing 9-1-1, our regional partners have placed 232 test calls across the state. The primary objective of the test was to determine if a 9-1-1 call would be delivered directly to a PSAP; the secondary objective was to determine if ALI was delivered to the PSAP. 37% of test calls using direct dialing and 16% of test calls using an outbound digit failed to reach a PSAP. While ALI was delivered in most cases, the quality of the information was not evaluated.

Our next step is to host a workshop on August 27th to facilitate dialogue and awareness, and take steps to ensure the capability for all persons to reach a PSAP when calling 9-1-1 from a MLTS. We have reached out to several

¹ CSEC is a state agency and Texas' authority on emergency communications. CSEC oversees and administers the provisioning of 9-1-1 service in 214 of Texas' 254 counties covering approximately two-thirds of the geography and one-fourth of the state's population.

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associations and government agencies in Texas so that as many as possible are aware of this initiative. We have already heard from the Texas Hotel & Lodging Association and are pleased that they are very interested in working with us. I have also had the privilege of being introduced and communicating with Hank Hunt via email. He is very supportive of these efforts and may be able to join us in August at the workshop.

Thank you for your continued efforts on this initiative. Please let me know if you have any questions or would like further information.

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A copy of this *ex parte* is being electronically filed in each of the above-referenced dockets.

If you have any questions, please contact me. Thank you.

Sincerely,



Patrick Tyler
General Counsel
512.305.6915