July 9, 2014

Via ECFS Electronic Filing

East Buchanan
Telephone Coop

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

Re: *Ex Parte* Comments – Text-to-911 / Next Generation 911
PS Docket No. 11-153, PS Docket No 10-255

Dear Ms. Dortch:

East Buchanan Telephone Cooperaive is a small business and rural telephone company that provides wireless services in the State of Iowa as part of the iWireless network. We appreciate the Commission's request for comments from small and rural CMRS carriers who are not signatories to the December 2012 Carrier-NENA-APCO Agreement.[1]

It is our understanding that the FCC has proposed rules that would require CMRS service providers and other providers of interconnected text messages to support text-to-911 capability no later than December 31, 2014, or within a reasonable time after a Public Safety Answering Point (PSAP) has made a valid request, not to exceed six-months. Because of our affiliation with a much larger network, our company's system is fully capable of supporting text-to-911 service. Our network also provides the required automatic bounce-back message when a consumer attempts to send a text-to-911 message to a PSAP that cannot accept 911 text messages.

While our network is text-to-911 ready, we remain concerned about the cost and feasibility of having to deploy further advanced capabilities, such as implementation of text-to-911 service for roaming customers or providing location accuracy information with text-to-911 messages. For this reason we respectfully urge the Commission to refrain from imposing regulatory mandates that extend beyond the scope of the voluntary Carrier-NENA-APCO Agreement unless and until there is demonstrated PSAP demand for SMS-based text-to-911 service, and then only if the advanced text-to-911 capability is technically feasible. As it stands today, according to the Commission's most recent findings,[2] only approximately 100 of the nearly 6,000 PSAPs in the US and its territories have completed text-to-911 deployments. Text-to-911 service was always meant to be an interim solution during the transition to next-

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1 *See* Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment, *Policy Statement and Second Further Notice of Proposed Rulemaking*, PS Docket Nos. 11-153, 10-255, 29 FCC Rcd 1547, 79 FR 10807, 79 FR 12442 (2014) at ¶ 18.

2 A list of PSAPs that have deployed text-to-911 service as of June 30, 2014 is available at: http://transition.fcc.gov/pshs/911/Text_911_Deployments.pdf

generation 911 ("NG911"). Requiring small and rural CMRS providers to set aside a portion of their limited resources to support "enhanced" text-to-911 services without a clearcut demand will hamper their efforts to extend 4G LTE networks and standards-based NG911 to rural and underserved communities.

In conclusion, we appreciate the Commission's support for voluntary and collaborative efforts by stakeholders in this proceeding and urge the Commission to refrain from imposing regulatory obligations on small and rural carriers that extend beyond the scope of the Carrier-NENA-APCO Agreement. Small companies should not be required to implement text-to-911 service unless and until they receive a valid PSAP request for such service, and the Commission should ensure that the waiver process for wireless carriers is simple and streamlined, and does not create an onerous threshold for carriers to qualify for waivers.

Sincerely,
East Buchanan Telephone Cooperative

Eugene A Rorabaugh

Eugene A Rorabaugh
General Manager
Title