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July 25, 2014

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW Room TW-A325  
Washington, DC 20554

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

Dear Ms. Dortch:

On Wednesday July 23, 2014, the undersigned of Bandwidth.com, Inc. (“Bandwidth”) met with David Furth, David Siehl, Tim May, Eric Ehrenreich, Dana Zelman, and Nicole McGinnis of the Public Safety and Homeland Security Bureau.

During our meeting we discussed the current state of the Commission’s and Bandwidth’s efforts to implement emergency service capabilities for other-the-top (“OTT”) text services as well as Bandwidth’s experiences with deploying Next Generation 911 capabilities in the state of Alabama. Bandwidth provided its perspectives as an integrated CLEC, provider of wholesale and retail VoIP, SMS services, and as an emergency services provider. Perspectives on technical and financial considerations associated with Text-to-911 and how wireless carriers’ text control center (“TCC”) functionality might be best incorporated in the near term as well as evolving NG911 network deployments were a principal point of discussion. Among other things, Bandwidth highlighted issues around the financial models of OTT SMS services as well as potential challenges for non-wireless carriers to connect to PSAPs with 911 SMS through established TCC that may be owned and operated by competitors.

In accordance with Section 1.1206(b), this *ex parte* notification is being filed electronically for inclusion in the public record of the above proceeding. Should there be any questions or concerns regarding this filing, please direct them to the undersigned.

Sincerely,

*/s/ Greg Rogers*

Greg Rogers

cc: David Furth  
David Siehl  
Tim May  
Eric Ehrenreich  
Dana Zelman  
Nicole McGinnis