

August 4, 2014

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

Re: Ex Parte Presentation PS Docket No. 11-153 and PS Docket No. 10-255

Dear Ms. Dortch:

On August 1st, 2014, Tim Lorello, Senior Vice President Telecommunication Systems, Inc. ("TCS"), held a discussion with Louis Peraertz, Legal Advisor to Commissioner Clyburn. The focus of the discussion was to provide a deeper understanding of issues related to Text-to-911. Three main areas were discussed:

- 1) the challenges associated with location fixes of texters to 9-1-1;
- 2) the status of Text-to-911 deployments, and
- 3) the status of and impediments to NG911 technology deployments within PSAPs.

Text-to-911, as deployed under the current voluntary compliance efforts of the four major wireless carriers, has challenges in getting a precise location fix for texters and is unable to get a location fix for persons roaming onto partner wireless networks. TCS discussed the technical foundation of the location challenges and outlined the use of existing "thin client" applications that can aid in providing location fixes in text-to-911 scenarios. TCS also validated the existence of location interoperability standards that exist today and are being considered for standardized use in LTE networks.

Regarding Text-to-911 deployments, TCS described the process by which it reports the status of deployments to its wireless carrier customers. This data has been gathered by the Public Safety and Homeland Security Bureau and has been frequently updated¹. The latest update currently available covers deployments through June 30th. TCS additionally explained that it has deployed over 130 sites and well over 150 are currently under deployment. The total would represent somewhat less than 5% of the PSAPs nationwide. The momentum associated with site deployment has increased, particularly because of Text Control Center interconnection agreements which allow a single PSAP deployment to automatically support three or more carriers going forward.

Regarding the upgrade of PSAPs to NG9-1-1 solutions, TCS indicated that there are an increasing number of requests for proposals from states that are looking to upgrade their

¹ The following link was provided by TCS as the source of the latest Text-to-911 deployment status:
http://transition.fcc.gov/pshs/911/Text_911_Deployments.pdf

existing PSAPs to comply with NG9-1-1 standards as defined by NENA's i3 specification. Because of support from carriers such as Verizon Wireless, TCS has been able to provide a web-based browser solution at no charge to the PSAP. This, and the availability of a less robust TTY solution, makes it possible for any PSAP immediately to support Text-to-911. By moving to NG9-1-1 systems, PSAPs can integrate Text-to-911 into their call handling solution, allowing them to use standardized operational procedures. TCS believes that Text-to-911 has been a catalyst for NG9-1-1 deployment.

Some PSAP directors with whom TCS interacts have expressed a desire for mass adoption by all wireless carriers before moving forward with Text-to-911 implementations. The voluntary compliance of a Text-to-911 solution by the four major wireless carriers has helped alleviate many concerns, and adoption has accelerated.

Some PSAPs have expressed a desire for precise location fixes and roaming solutions before moving forward. Others have expressed concerns with regards to spam or potential cybersecurity breaches. Now that many PSAPs have deployed Text-to-911 solutions and that none have experienced spam or an inundation of Text-to-911 messages, the spam has been addressed. Cybersecurity continues to be a major PSAP concern, and though this could be an impediment to the adoption of NG9-1-1 call handling solutions, it is unclear that this is an impediment to Text-to-911.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendee. Please direct any questions to the undersigned.

Sincerely,

Stinson Leonard Street LLP

/s/ H. Russell Frisby, Jr.
H. Russell Frisby, Jr

HF:SLS

Attachments

cc: Louis Peraertz