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December 6, 2012

Chairman Julius Genachowski  
Commissioner McDowell  
Commissioner Clyburn  
Commissioner Rosenworcel  
Commissioner Pai  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, DC 20554

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

Dear Chairman Genachowski and Commissioners McDowell, Clyburn, Rosenworcel and Pai:

The undersigned signatory text-message service providers have agreed to voluntarily offer their subscribers text-based emergency communication services, in accordance with the Alliance for Telecommunications Industry Solutions (“ATIS”) industry standard solution (currently expected to be completed in the first quarter of 2013), to requesting public safety answering points (“PSAPs”). As a step towards a comprehensive Next Generation 9-1-1 (“NG9-1-1”) system, this voluntary framework for a text-to-9-1-1 solution provides near-term opportunities to meet the emergency communications needs of wireless subscribers who (currently) rely on SMS for everyday communications and individuals who are deaf, hard of hearing or speech impaired. This framework also accommodates the service providers’ need to respond to the rapid evolution of the telecommunications marketplace by deploying whatever successor technologies are deemed appropriate by the service provider to satisfy current and future requirements of the text-to-9-1-1 service.

This voluntary commitment reflects discussion with the signatories and public safety stakeholders, and is intended to reflect and incorporate much of the important work undertaken by public safety, disabilities and industry stakeholders through the Emergency Access Advisory Committee (“EAAC”). As the wireless provider signatories have advised the Commission and the EAAC, SMS is a store-and-forward messaging technology that was never designed nor deployed to provide any time-sensitive, mission-critical service.<sup>1</sup>

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<sup>1</sup> *Facilitating the Deployment of Text-to-911 and Other Next Generation Applications, Framework for Next Generation 911 Deployment*, Notice of Proposed Rulemaking, FCC 11-134 ¶ 53 (Sept. 22, 2011); *see also*, *Text Messages in a PSAP Environment*, APCO Emerging Technologies (rel July 30, 2012) available at <http://psc.apcointl.org/wp-content/uploads/APCO-Emerging-Tech-Text-to-911-Final1.pdf> and *Texting to 9-1-1: Examining the Design and Limitations of SMS*, 4G Americas (October 2010) available at <http://www.4gamericas.org/documents/SMS%20to%20911%20White%20Paper%20Final%20October%202010.pdf>, but *see*, FCC EAAC, Resolution regarding Text Messaging to 911 (adopted March 30 2012) (recommending Text Messaging to 9-1-1, at a minimum, via SMS); and Presentation of EAAC Working Group 1, Text-to-911 Solutions to 911 Interim to NG911 (Sept. 14, 2012) (outlining key assumptions about Pre-NG911 Interim Text to 911).

Consistent with these parameters, this commitment is being offered through the provision of an interim “best-efforts service” to meet the near term objective of providing a text-based emergency communications until the comprehensive NG9-1-1 system (e.g. ESINet) is developed, deployed and adopted by the wireless industry, public safety community and public.

The terms of this commitment cover only the text-messaging services provided by the signatories. They do not extend to text-messaging applications provided by third parties..

The signatories make the following voluntary commitments:

- 1) Text-to-9-1-1 service would be made available by May 15, 2014, although carriers may choose to implement such a service prior to that date. Once a carrier begins offering a Text-to-9-1-1 solution, valid PSAP requests for Text-to-9-1-1 service will be implemented within a reasonable amount of time of receiving such request, not to exceed six months. A request for service will be considered valid if, at the time the request is made: a) the requesting PSAP represents that it is technically ready to receive 9-1-1 text messages in the format requested; and b) the appropriate local or State 9-1-1 service governing authority has specifically authorized the PSAP to accept and, by extension, the signatory service provider to provide, text-to-9-1-1 service (and such authorization is not subject to dispute).
- 2) Beginning no later than July 1, 2013, the four signatory service providers will voluntarily provide quarterly progress reports to the FCC, NENA, and APCO summarizing the status of the deployment of a national Text-to-9-1-1 service capability. Once a service provider is able to deploy service for capable PSAPs on a national basis, it would no longer be required to provide these status reports.
- 3) Consistent with the draft ATIS Standard for Interim Text-to-9-1-1 service, the PSAPs will select the format for how messages are to be delivered. Incremental costs for delivery of text messages (e.g. additional trunk groups to the PSAP’s premises required to support TTY delivery) will be the responsibility of the PSAP, as determined by individual analysis.
- 4) The signatory service providers will implement a ‘9-1-1’ short code that can be used by customers to send text messages to 9-1-1.
- 5) Before the deployment of Text-to-9-1-1, the signatory service providers will implement a bounce-back (auto-reply) message to alert subscribers attempting to text

an emergency message to instead dial 9-1-1 when Text-to-9-1-1 is unavailable in that area. The signatory service providers will implement the bounce-back (auto-reply) message by June 30, 2013.

- 6) The signatory service providers will meet these commitments independent of their ability to recover these associated costs from state or local governments.
- 7) The signatory service providers (whether individually or through a third party) will work with APCO, NENA, and the FCC to develop an outreach effort to set and manage consumer expectations regarding the availability/limitations of the Text-to-9-1-1 service (including when roaming) and the benefits of using voice calls to 9-1-1 whenever possible, and support APCO and NENA's effort to educate PSAPs on Text-to-9-1-1 generally.
- 8) A voluntary SMS-to-9-1-1 solution will be limited to the capabilities of the existing SMS service offered by a participating wireless service provider on the home wireless network to which a wireless subscriber originates an SMS message. SMS-to-9-1-1 will not be available to wireless subscribers roaming outside of their home wireless network. Each implementation of SMS-to-9-1-1 will be unique to the capabilities of each signatory service provider or its Gateway Service Provider.

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 attendees. Please direct any questions to the undersigned.

Respectfully Submitted,

*/s/ Terry Hall*  
**APCO International**

*/s/ Charles W. McKee*  
**Sprint Nextel**

*/s/ Robert W. Quinn, Jr.*  
**AT&T**

*/s/ Kathleen O'Brien Ham*  
**T-Mobile USA**

*/s/ Barbara Jaeger*  
**NENA- The 9-1-1 Association**

*/s/ Kathleen Grillo*  
**Verizon**



# NEWS

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This is an unofficial announcement of Commission action. Release of the full text of a Commission order constitutes official action.  
See MCI v. FCC, 515 F.2d 385 (D.C. Circ 1974).

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FOR IMMEDIATE RELEASE:  
December 6, 2012

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**FCC CHAIRMAN JULIUS GENACHOWSKI ANNOUNCES COMMITMENT BY MAJOR U.S. WIRELESS CARRIERS & PUBLIC SAFETY LEADERS TO ACCELERATE NATIONWIDE TEXT-TO-911 SERVICES; CALLS FOR CONTINUED ENGAGEMENT WITH FCC ON NEXT-GENERATION 9-1-1 INITIATIVES**

*Voluntary agreement responds to Chairman Genachowski's call for action to enable nationwide text-to-911 for all Americans "as quickly as possible"*

Washington, D.C. – FCC Chairman Julius Genachowski announced today that the nation's four largest wireless carriers – AT&T, Verizon, Sprint, T-Mobile – have agreed to accelerate the availability of text-to-911, with major deployments expected in 2013 and a commitment to nationwide availability by May 15, 2014. Building on text-to-911 deployments and trials that are already underway, this agreement will accelerate progress and ensure that over 90 percent of the nation's wireless consumers, including millions of consumers with hearing or speech disabilities, will be able to access emergency services by sending a text message to 911, where local 911 call centers (known as a Public Safety Answering Points, or PSAPs) are also prepared to receive the texts.

Text-to-911 will provide consumers with enhanced access to emergency communications in situations where a voice call could endanger the caller, or a person with disabilities is unable to make a voice call. Text-to-911 will be a complement to, not a substitute for, voice calls to 911 services, and consumers should always make a voice call to 911 during an emergency if they can.

In addition, to help eliminate consumer confusion while text-to-911 capability is being phased-in, the carriers have committed to provide an automatic "bounce back" text message to notify consumers if their attempt to reach 911 via text message was unsuccessful because this service is not yet available in their area. Such a message would instruct the recipient to make a voice call to a 911 center. The four carriers will fully implement this "bounce back" capability across their networks by June 30, 2013.

The Commission will take additional action as necessary to ensure the public's ability to reach 911 using text messaging. Next week, the FCC will consider steps towards ensuring that text-to-911 is made available as soon as possible by all carriers, and over-the-top providers who offer Internet-based text services. The Commission will continue to work with all stakeholders including 911 authorities, PSAPs, the Emergency Access Advisory Committee, public safety organizations, disability organizations, consumer groups and industry on this issue.

Today, Chairman Genachowski said, "Access to 911 must catch up with how consumers communicate in the 21<sup>st</sup> century – and today, we are one step closer towards that vital goal. Last year I announced a comprehensive plan to accelerate the transition to Next Generation 911, including text-to-911, and the FCC has acted to advance this effort.

“I also called on the communications industry and public safety entities to work together to enable nationwide text-to-911 as quickly as possible, and I am pleased that the nation’s four largest wireless carriers and leading public safety organizations have responded with today’s commitment, which will save lives starting in 2013.

“This is good progress, but our work is not done. Next week the FCC will consider further actions to advance text-to-911 for all consumers. We will also take additional steps in this area next year, including closely monitoring carriers’ compliance with the commitments they have made today and addressing other aspects of Next Generation 911 such as enabling transmission of photos and videos to 9-1-1 centers. We are also working to strengthen the resiliency and reliability of the existing 911 system, where significant deficiencies were revealed by this summer’s Derecho.”

“I would like to thank all those involved in developing today’s important agreement.”

In his 2011 address to the Association of Public Safety Communications Officials (APCO) about Next Generation 911 (NG911) services, which includes but is not limited to text, Chairman Genachowski said, “Getting NG911 up and running is going to take a lot of work on the part of a lot of people. Without a comprehensive and coordinated strategy, we’ll see a patchwork deployment of NG911 over the next 5 to 10 years, with much of the United States still without any NG911 capability at the end of that period. That’s not the right outcome. It’s imperative that NG911 be deployed to all Americans as quickly as possible, and in the most effective and cost-efficient way.”

To read the Chairman’s full speech at APCO, please click [HERE](#).

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