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September 8, 2011

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: PS Docket No. 10-255  
*Ex Parte* Presentation

Dear Ms. Dortch:

On September 7, 2011, representatives from the Alliance for Telecommunications Industry Solutions' (ATIS) Interim Non-voice Emergency Services (INES) Incubator met with representatives from the Commission's Public Safety and Homeland Security and Consumer and Governmental Affairs Bureaus. The purpose of this meeting was to provide an update on the work of the ATIS INES Incubator, which is working to identify an interim solution(s) for text-based wireless communications to existing 9-1-1 services as an alternative to the text telephone system (TTY) while Next Generation 9-1-1 ("NG9-1-1") solutions are under development.

As noted in the attached presentation that was provided to attendees, the ATIS INES Incubator held its initial meeting in April 2011, and plans to complete its work by the end of 2011. The INES Incubator will evaluate any candidate technology based on the evaluation criteria that were developed with the input of wireless and public safety industries, public safety community representatives and representatives of consumers with hearing disabilities. The Incubator intends to recommend a common technology solution(s) that best meets the evaluation criteria including whether a particular solution is widely available that can be deployed nationally and quickly with minimal impact on consumers with hearing disabilities, public safety entities and the wireless industry. It was also noted that the INES Incubator may seek the Commission's guidance and support to ensure federal and state policies and regulations permit an interim solution(s).

The following representatives from the Public Safety and Homeland Security Bureau were present at this meeting: David Furth, Deputy Chief; Aaron Garza, Attorney Advisor; Jerry Stanshine, Engineer; Patrick Donovan, Attorney Advisor, Policy and Licensing Division; David Siehl, Attorney Advisor, Policy and

Licensing Division; Tim May, Analyst, Policy and Licensing Division; and John Healy, Associate Division Chief, Cybersecurity and Communications Reliability Division.

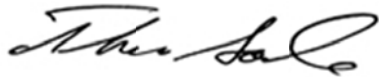
The following representatives from the Consumer and Governmental Affairs Office were present at this meeting: Karen Peltz Strauss, Deputy Chief; and Cheryl King, Deputy Chief, Disability Rights Office.

Attending on behalf of the ATIS INES were: INES Vice-Chair George Stanek, Manager, AT&T; Mary Brooner, Consultant, T-Mobile; Matthew Gerst, Counsel, External and State Affairs, CTIA-The Wireless Association®; Praveen Goyal, Director U.S. Government Affairs, RIM; Jim Nixon, Director Government Affairs, T-Mobile; Thomas Goode, General Counsel, ATIS; and Jim Turner, Technical Coordinator, ATIS.

Pursuant to the Commission's rules, one copy of this letter is being filed electronically for inclusion in the public record of the above-referenced proceeding.

If you have any questions about this matter, please contact the undersigned.

Sincerely,



Thomas Goode  
General Counsel

Attachment

cc: Patrick Donovan



# **ATIS Interim Non-voice Emergency Services (INES) Incubator FCC Report**

September 7, 2011



# Agenda

- INES Incubator Mission & Membership
- INES Timeline & Progress
- INES Candidate Solution Evaluation Process
- FCC Policy Support for Interim Solution



## INES Incubator Mission

- INES will evaluate any common solution that is widely available which can be deployed nationally and quickly with minimal impact on target consumers, PSAPs and the wireless industry and permitted under federal and state 9-1-1 rules.
  - An interim solution benefits the public, public safety and the wireless industry and INES will coordinate with all affected stakeholders.
  - All candidate solutions are “on the table” for evaluation.
  - INES will identify the best possible solution based on a developed list of requirements.
  - INES solution will minimally impact existing users and will look to replace TTY on future mobile handsets.
  - An interim solution must be deployable nationally and in the most expedient manner possible or the utility of such a solution will diminish.
  - INES will work with the FCC to coordinate policy and regulatory changes that may be needed to support an interim solution.
- Consumer input is critical to the INES process.



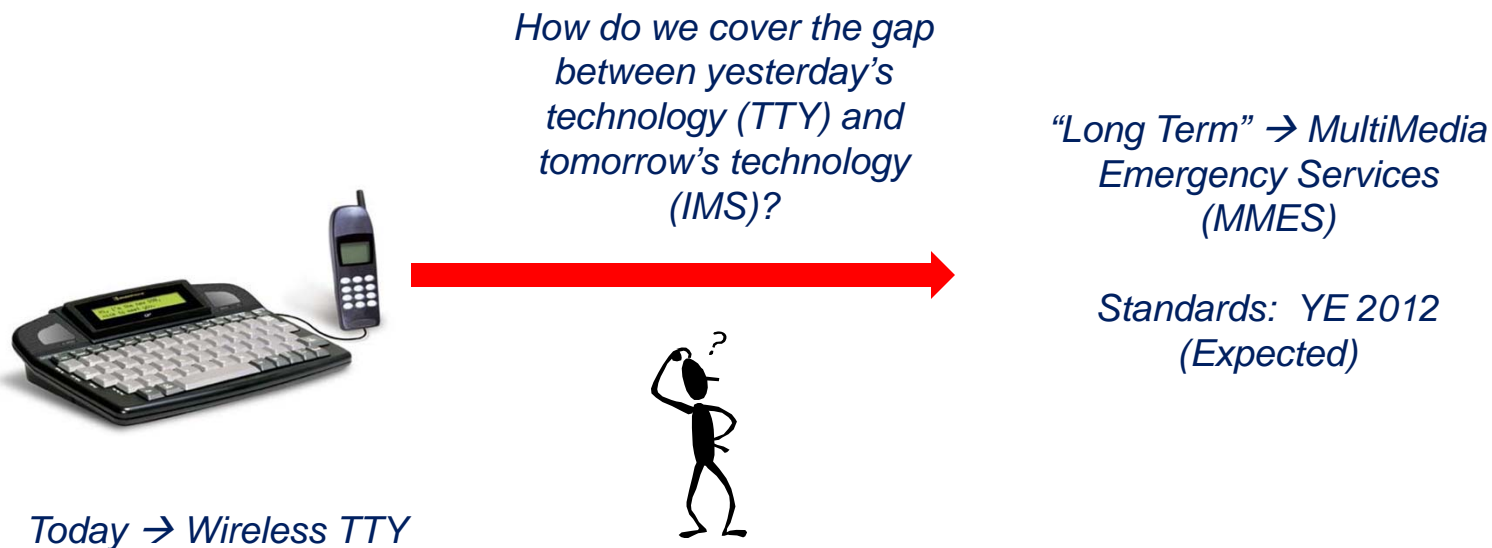
## INES Incubator Member Companies

- Alcatel-Lucent
- AT&T
- INdigital Telecom
- Intrado
- Nokia
- NSN
- RIM
- Samsung
- Sprint
- TCS
- T-Mobile
- Verizon Wireless
- ZTE



## ATIS INES Overview

ATIS INES Incubator: Created to bridge the gap between today's *wireless* TTY-based emergency communications and the IMS-based non-audio emergency services of tomorrow.





## Basis of INES

- **TODAY:** Accessibility community and FCC seek an alternative to the wireless TTY system that is a dated and underutilized technology for 9-1-1 communications.
- **FUTURE:** A long-term solution that will provide multi-media communications with 9-1-1.
- **QUESTION:** Is there a solution that enables non-audio communications to a PSAP that can be identified and deployed before a long-term solution is available?
- **ANSWER:** There are a number of variables that must be considered before an “interim” solution is identified. The INES Incubator provides a forum for industry to expedite the analysis of potential solutions that will take advantage of what technology today has to offer.





## INES Progress Report

- Initial meeting of the INES Incubator (April 2011)
- Introduce INES Incubator to EAAC (May 2011)
- Finalize evaluation criteria (May 2011)
- Review process and criteria with consumer advocacy groups and Wireless RERCs (June 2011)
  - Incorporated consumer feedback
- Finalize list of candidate technical solutions (August 2011)



## INES Progress Report (*cont'd*)

- Develop technical performance requirements to facilitate solution selection (August 2011)
  - Review progress with consumer advocacy group representatives (September 2011)
- Update on INES progress to EAAC (September 2011)
- Select candidate solution that best meets evaluation criteria (Targeted October 2011)
  - Review candidate solution with consumer groups representatives
- Complete solution technical documents (Targeted December 2011)
  - Technical Report
  - Test Specification



# Evaluation Criteria

Evaluation criteria include the following requirements:

- Commercially available end-to end by June 2012
- Minimal impact to:
  - Networks
  - Handsets
  - PSAPs
  - Consumers
- 100% national solution
- Easy to use for consumer
- Platform independent
- Provide coarse location, directly or indirectly, to the PSAP
- Use a single nationwide number
- Preserve PSAP ability to log and record calls
- Communications with PSAP should be secure and private



# Landscape of Candidate Technical Solutions

## Consumer to PSAP

- Emergency Voice Call then SMS
- Emergency Voice then Web Chat
- Instant Messaging
- Real Time Text Direct to PSAP
- Real Time Text Converted to TTY
- TTY Emulation
- Video ASL
- SMS Direct to PSAP

## Consumer to Relay Services to PSAP

- IP Relay Service
- Video Relay Service
- National SMS Relay
- National RTT Relay
- Home PSAP Relay



## Evaluation Process

- INES will assess candidate solutions against evaluation criteria.
  - No candidate technical solution meets all evaluation criteria.
    - INES will prioritize the evaluation criteria to facilitate the selection process.
- INES will identify the candidate solution that best meets the evaluation criteria.



## Technical Documentation

- Technical Report – Describes evaluation process and recommendations
- Test Specification – Needed to ensure the interim solution is uniformly deployed nationally



## FCC Policy Support for Interim Solution

- Depending on the solution selected, policy clarification of regulatory issues may be necessary to support an interim solution, such as:
  - For other emergency communications, the NET 911 Improvement Act of 2008 provides the same immunity or other protection from liability of a scope and extent that exists for voice communications to 9-1-1.
  - Consistent with Section 106 (c)(6) of the Communications & Video Accessibility Act of 2010, the stakeholders may seek support from the FCC to set a deadline for the elimination of the TTY mandate on future wireless handsets when an interim solution is identified.
    - INdigital reports that, out of the 11 million wireless emergency calls placed in Indiana in the last five years, only 11 were TTY.



## **INES Incubator will:**

- Identify interim solution that best meets evaluation criteria;
- Seek consumer input;
- Complete task group work within identified timeframe to meet interim solution objectives;
- Document results; and
- Work with the FCC to ensure policy and regulatory support of interim solution.