

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
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	)	
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
	)	

**Joint Reply Comments of the  
Alliance for Telecommunications Industry Solutions and  
the Telecommunications Industry Association**

The Alliance for Telecommunications Industry Solutions (ATIS) and the Telecommunications Industry Association (TIA) jointly submit these joint reply comments in response to the *Further Notice of Proposed Rulemaking (FNPRM)*, released December 13, 2012, in the above-referenced dockets. In the *FNPRM*, the Federal Communications Commission (Commission) proposes rules that will enable consumers to send text messages to 911. ATIS and TIA are jointly developing the industry standard – *Joint ATIS/TIA Native SMS to 9-1-1 Requirements and Architecture Specification (J-STD-110)* – that will define the requirements and architecture for text messaging to 911 emergency services using native wireless operator Short Message Service (SMS) capabilities. These joint reply comments provide information pertaining to the development of this joint standard.

## **I. BACKGROUND**

**ATIS.** ATIS is a global standards development and technical planning organization that leads, develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS' diverse membership includes key stakeholders from the ICT industry – wireless and wireline service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, public safety agencies, digital rights management companies, and internet service providers. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs. Technical, operational, and business priorities are also examined by ATIS through its Technology and Operations (TOPS) Council, a group established by the ATIS Board of Directors to identify and address the ICT ecosystem's needs through focused, expedited efforts.

Among ATIS' technical committees are the Wireless Technologies and Systems Committee (WTSC) and Emergency Services Interconnection Forum. The ATIS WTSC develops and recommends standards and technical reports related to wireless and/or mobile services and systems, including service descriptions and wireless technologies. The ATIS ESIF facilitates the identification and resolution of technical and/or operational issues related to the interconnection of emergency services networks with other networks (e.g., wireline, cable, satellite, Internet, etc.).

**TIA.** TIA is a leading trade association representing the global information and communications technology (ICT) industry through Standards development, Policy initiatives, business opportunities, market intelligence and networking events. With support from hundreds of members, TIA enhances the business environment for companies involved in telecom, broadband, mobile wireless, information technology, networks, cable, satellite, unified

communications, emergency communications and the greening of technology. Among their numerous lines of business, TIA member companies design, produce, and deploy a wide variety of equipment used to protect life and property and to make technology accessible to all Americans. TIA is accredited by ANSI.

Mobile and Personal Communications Standards Subcommittee TR-45.8, a subcommittee of TIA Engineering Committee TR-45, develops: (1) performance, compatibility, and interoperability standards for equipment that supports Wireless Packet Data, which is independent from, and may be adjunct to, a system that supports any combination of public, non-public, or residential mobile and personal communications; (2) circuit switched core network and multi-media core network standards that pertain to service definition and network interface standards for support of interoperability and intersystem operations, for interfaces between those network elements that comprise the infrastructure, in support of seamless service to wireless subscribers, other mobile and personal communication network systems, auxiliary systems, and to other networks; and (3) standards pertaining to regional regulatory capabilities.

## II. COMMENTS

In the *FNPRM*, the Commission seeks comment on a number of text-to-911 issues, including proposed obligations regarding the automatic notification of consumers attempting to text-to-911 in areas where this functionality is not supported or in other instances where the text cannot be transmitted to the Public Safety Answering Point (PSAP).<sup>1</sup> ATIS and TIA submit these joint reply comments to provide information pertaining to the development of the *Joint ATIS/TIA Native SMS to 9-1-1 Requirements and Architecture Specification (J-STD-110)*, which, among other things, addresses the sending of bounce-back messages by service providers.

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<sup>1</sup> See *NPRM*, Section III. A.

In April 2012, ATIS initiated this joint standards activity, and subject matter experts participating on the ATIS WTSC, ESIF, and TIA TR45.8 have been jointly working on this specification, which is focused on text messaging to 911 emergency services for wireless operator native SMS capabilities. These groups have concluded their initial work on the standard and, as a result of this successful collaborative process, the draft J-STD-110 was sent out for ballot on February 5, 2013. Under the established joint standards development processes, members of the respective ATIS and TIA committees will vote separately whether to approve the proposed joint standard, with any comments addressed by the joint group as necessary. It is anticipated that this joint standard will be published as a final document by the end of March 2013.

Once approved, this joint standard will define the requirements and architecture for text messaging to 911 emergency services using native wireless operator SMS capabilities for the existing generation and next generation (NG911) PSAPs. In addition, this standard will contain a definition, assumptions, and requirements for the bounce-back message, which will be aligned with the voluntary industry agreement that was jointly announced on December 6, 2012, by AT&T, Sprint Nextel, T-Mobile USA, Verizon, APCO International and NENA – The 9-1-1 Association.<sup>2</sup>

Under the draft standard, a “bounce-back message” is “an SMS message that is sent back to the user that initiates an SMS message to 9-1-1. This bounce-back message is sent whenever texting to 9-1-1 service is not available. The content of the bounce-back message will inform the

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<sup>2</sup> See Letter to FCC Chairman Julius Genachowski, Commissioner McDowell, Commissioner Clyburn, Commissioner Rosenworcel and Commissioner Pai, from AT&T, Sprint Nextel, T-Mobile USA, Verizon, APCO International and NENA – The 9-1-1 Association, filed December 6, 2012, in PS Docket Nos. 10-255, 11-153. Under this agreement, the signatory text-message service providers agreed to voluntarily offer their subscribers text-based emergency communication services to requesting PSAPs in accordance with the ATIS industry standard solution. The ATIS standard referenced in this agreement is J-STD-110, the ATIS/TIA joint standard.

user that text to 9-1-1 service is not available and that the user should make a voice call to 911 for help.”<sup>3</sup> The draft standard further specifies that the bounce-back message shall be a single, non-segmented SMS message in English that is sent back to the directory number of the user by the Text Control Center (TCC),<sup>4</sup> not by the PSAP.<sup>5</sup>

The industry recognizes that it is important that the bounce-back message be clearly understandable by all consumers, including those that are deaf or hard of hearing. The draft standard therefore recommends that service providers consider utilizing a straight-forward, clear bounce-back message similar to the following: “Make a voice call to 911 for help; text to 911 is not available.”<sup>6</sup>

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<sup>3</sup> Draft *J-STD-110*, Section 3.1.1.

<sup>4</sup> The TCC is a new functional entity defined in the draft standard. As defined in Section 7.2.1 of draft *J-STD-110*, the TCC is the controlling functional element that has the responsibility to: (1) convert various protocols and act as a gateway; (2) request location that may be used for routing; (3) request routing instructions; and (4) initiate a dialogue with the PSAP through the appropriate interworking function of the TCC. When the TCC receives an initial text message, it obtains location from the Location Server. It then uses that location to obtain routing instructions from the Routing Server. The TCC then converts the text message to an appropriate protocol and initiates a dialogue with the PSAP (via the emergency services network) through the appropriate interworking function of the TCC.

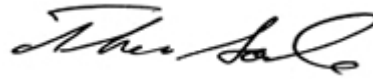
<sup>5</sup> Draft *J-STD-110*, Section 6.

<sup>6</sup> Draft *J-STD-110*, Section 4.

### III. CONCLUSION

ATIS and TIA are pleased to have the opportunity to provide this update on the development of *J-STD-110*. The success of this collaborative effort demonstrates the value of voluntary industry standards in promoting the development and deployment of solutions to important challenges facing the telecommunications industry.

Respectfully submitted,



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