



601 Pennsylvania Ave., NW  
North Building, Suite 800  
Washington, DC 20004

July 1, 2013

Mr. David Turetsky  
Chief, Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Status of T-Mobile's Implementation of Voluntary Text-to-911 Commitment**

Dear Mr. Turetsky:

On December 6, 2012, T-Mobile, USA, a wholly-owned subsidiary of T-Mobile, US (“T-Mobile”) made a voluntary commitment to offer interim text-to-911 service nationwide by May 15, 2014.<sup>1</sup> As part of that pledge, T-Mobile agreed to provide the Commission with quarterly status reports on the deployment of a national Text-to-911 capability.<sup>2</sup> Accordingly, T-Mobile is providing you its first quarterly status update.<sup>3</sup>

**Technical coordination.** From a technical standpoint, T-Mobile has been actively engaged in preparatory work to ensure it meets its commitment to deploy nationwide a Text-to-911 solution by May 15, 2014. For example, T-Mobile continues to be involved with the joint Alliance for Telecommunications Industry Standards/Telecommunications Industry Association’s work on text-to-911 standards, as well as a new joint issue that focuses on implementing those standards. Furthermore, T-Mobile is part of the NENA’s SMS Text Service Coordination Group which is tasked with, in part, identifying common implementation milestones. It is important to develop new capabilities in emergency communications, such as text-to-911, in a collaborative environment with both the public safety community and industry working together.

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<sup>1</sup> See Letter of APCO International (“APCO”), NENA – The 9-1-1 Association (“NENA”), AT&T, Sprint Nextel, T-Mobile USA and Verizon to Chairman Genachowski and Commissioners McDowell, Clyburn, Rosenworcel and Pai, PS Docket No. 10-255, 11-153 (filed December 6, 2012)(“Text-to-911 Commitment Letter”).

<sup>2</sup> *Id.* at 2.

<sup>3</sup> Pursuant to its commitment, T-Mobile is also providing copies of this report to NENA and APCO.

**Vendor support and connectivity.** T-Mobile has selected a text-to-911 vendor and is currently designing a production configuration in accordance with the ATIS/TIA J-Std-110 “Joint ATIS/TIA Native SMS to 9-1-1 Requirements and Architecture Specification” document published in March 2013. In addition, T-Mobile has started laboratory connectivity efforts with the vendor. T-Mobile is making progress with designing and developing an interim text-to-911 solution as a step towards a comprehensive Next Generation 9-1-1 system.

**Consumer outreach.** T-Mobile has also begun to address consumer outreach. As an initial matter, consistent with its commitment, T-Mobile already provides a bounce-back message to its customers who attempt to send an SMS to 911, and has done so since January 2012. The auto-reply response indicates to the consumer there is no text service to 911 available in that area and instructs the user to make a voice call to 911 for emergency services. T-Mobile has also updated the 911 information page on its website to include information on text-to-911, specifically informing consumers that a voice call to 911 is the best way to summon emergency assistance, and that text-to-911 is not available from T-Mobile at this time.<sup>4</sup> Finally, T-Mobile is working with the Federal Communications Commission and other stakeholders in an effort to educate the public about the capabilities of text-to-911 in order to set appropriate consumer expectations.

**Other.** In regards to MetroPCS, T-Mobile is in the process of integrating its network with T-Mobile. Currently, MetroPCS provides a bounce-back message to subscribers who attempt to send SMS text messages to 911 informing the subscriber to use another method to contact emergency services.

**Conclusion.** T-Mobile is pleased to report that it is on track to meeting the voluntary commitment it made to provide text-to-911 service nationally by May 15, 2014.

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<sup>4</sup> See [http://www.t-mobile.com/Company/CompanyInfo.aspx?tp=Abt\\_Tab\\_CompanySafety&tsp=Abt\\_Sub\\_911](http://www.t-mobile.com/Company/CompanyInfo.aspx?tp=Abt_Tab_CompanySafety&tsp=Abt_Sub_911).

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Please do not hesitate to contact me at (202) 654-5918 if you or your staff should have any questions.

Respectfully,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Director, Chief Engineering and Technical Policy,  
Federal Regulatory

cc: David Furth, Deputy Chief, PSHSB  
Derek Poarch, APCO International  
Brian Fontes, NENA – The 911 Association