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November 13, 2013

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

Re: Notice of Ex Parte Presentation - Facilitating the Deployment of Text-to-911 and Other Next Generation Applications, PS Docket No. 11-153 and Framework for Next Generation 911 Deployment, PS Docket No. 10-255

Dear Ms. Dortch:

The State of Vermont Enhanced 9-1-1 Board (Board) is providing this letter to enhance the record related to the text to 9-1-1 proceedings at the Federal Communications Commission.

The Board began its exploration of text to 9-1-1 with a six month trial launched in April, 2012, with Verizon Wireless and our main technology provider Intrado. Based largely on two successful responses to emergencies reported during the trial, Verizon agreed to leave the text service in place and it continues to play an important role in providing emergency services in Vermont. Last December, we launched a second trial with Sprint, which ran for five months. That trial was successful although it ended without receipt of any emergency texts. In late August of this year, we launched the third trial, this time with AT&T, and that trial is ongoing. With both AT&T and Verizon providing text to 9-1-1 services in Vermont, 90% of our citizens now have access to 9-1-1 via SMS text messaging. Reaching that threshold made it practical to begin a public education initiative on this important new service, and we have seen a small but consistent uptick in the number of emergency texts received since the latest trial with AT&T and our public education initiative began. We are continuing to work with both Sprint and T-Mobile and hope to have those carriers providing text to 9-1-1 services in Vermont as soon as possible.

To the best of our knowledge, Vermont 9-1-1, (which is a single-system, statewide service), has had the most experience with this new technology in an operational 9-1-1 environment. We have been asked on several occasions about that experience, and we provided information on the successful interventions noted above in a previous filing with the Commission.

Therefore, we have taken a look at the whole of our text to 9-1-1 experiences since first launching the Verizon trail about eighteen months ago. We thought the Commission and

interested parties, as well as the Vermont 9-1-1 system itself, could benefit from a more comprehensive report of our experience. Specifically, we want to help establish expectations of how this service may impact the 9-1-1 organizations that are beginning to implement the service, as well as those who may still have some trepidation about what it will all mean in their jurisdictions.

Of course, we recognize that our experience may or may not be indicative of what others will experience. There actually isn't a lot of data upon which to begin to draw some tentative impressions. To the extent that the trials in this small state have provided some evidence of how citizens may use this service, we offer the following details. Please note that the data is current through November 8, 2013, and represents the whole of our experience with all three trials.

Since April of 2012, 257 texts to 9-1-1 have been processed and received. Of those 257 texts, 124 were tests conducted as part of establishing and maintaining the service. Of the remaining 133 texts, 10 were actually continuations of a previously received text, the session for which ended unexpectedly. The remaining 123 texts are categorized as follows:

- 54 appear to be accidental texts, intended for another recipient (for example, "whasup?", "do you still like me?"). Attempts to confirm the existence of an emergency by the 9-1-1 call taker went unanswered.
- 28 were confirmed to have been accidental, as a response to that effect was received by the 9-1-1 call taker following a query of "Vermont 9-1-1, where is your emergency".
- 7 were contacts regarding a crime that were not deemed to be an emergency (report of stolen property, for example) and the individual was able to take a voice call to complete the report.
- 34 were legitimate emergencies that required some type of response. Those emergencies are broken down as follows:
  - 2 automobile accidents
  - 1 burglary in progress, other location
  - 1 intruder in residence
  - 1 attempt to enter residence
  - 1 burglary in progress at location of citizen
  - 1 child left alone in vehicle
  - 2 erratic operation of other vehicle
  - 4 involving domestic violence
  - 2 involving the sale or use of drugs, including a report of over 40 college students who were celebrating 4/20, otherwise known as national "weed" day
  - 6 non-life threatening medical emergencies of various types
  - 1 overdose, unknown whether drugs or alcohol involved
  - 1 operation of damaged vehicle
  - 1 stabbing incident
  - 1 suspicious person
  - 1 theft in progress
  - 1 violation of conditions of release (parole)
  - 1 threatening male refusing to leave premise
  - 1 cutting, self-injury
  - 4 suicide threat
  - 1 request for police – unknown reason

Some first impressions. One: there were a significant number of non-emergency texts sent. We think that the first group of 54 is most likely individuals who were fooling around with their text device and/or didn't believe that there would be any type of response to a text to 9-1-1 in Vermont. Attempts to get a response after responding to the initial text went unanswered, and the nature of the first outreach at least suggests someone was either "testing" us to see if they would get a response or perhaps being irresponsible in how they are using their text device. We have had one situation where it was so clear by the nature of the text messages that it was a joke that the call taker informed the individual they were in violation of state law, and the behavior stopped.

Two: with regard to the accidental texts that were confirmed, although we get in some cases a phone number associated with the device on which the text was sent, it is probably not a good practice to call those numbers back if they abandon, because the text could have come from an individual in a dangerous situation where making a voice call in return to an abandoned text is not safe.

Three: while we do not know if any of the texts came from individuals who are deaf, hard of hearing or have a speech impairment, it is clear that text is helpful in situations where individuals are in danger and making a voice call could increase that danger. We count nine texts that involve dangerous situations, including the domestic violence situations and intruders or burglaries in progress.

Four: we were surprised at the relative number of texts received involving suicide situations. In one case, responders got to the person who had hung themselves and saved their life. In the other three suicide threats, the call taker was able to keep the person engaged until someone could respond and get them counseling or other help. We don't know what that suggests other than perhaps in those specific situations, the individual chose to reach out for help via non-traditional means. (One of the suicide cases involved a minor who had taken some medicine and didn't want to disturb her parents). It suggests the need to revisit training for call takers who receive any type of notification of a potential suicide and that work is underway.

Fifth: after removing the test texts, the total number of texts received, even counting the non-emergency texts and/or abandoned texts, was not so great as to impose an unreasonable burden on available PSAP resources. 123 texts over an 18 month period, or about 7 a month, is not excessive. So far, we have been able to manage the additional workload through one of our eight PSAPs only, although we are working on getting a second PSAP enabled for backup purposes. As we begin to approach ubiquitous text to 9-1-1 services in Vermont, that number could grow and we need to be mindful of ways to head that off. Public education may provide the means to that end. We think that as more people become aware of text to 9-1-1, the number of non-emergency texts will tend to decrease, as the novelty of the service wears out. But that is speculation at this point in time.

Sixth: unlike a voice call to 9-1-1, where the call taker will conference in a dispatch service or emergency responder, we have no recording of that conversation attached to the text message, although we can find the outbound call if we search for it. While we can usually clearly identify the type of emergency being reported from reading the text logs, (and we ask the public to provide that info along with their location when

they first contact us) there remain aspects of these interactions that are simply unknowable or at least more difficult to track than are standard voice calls. We had to request updates from police dispatch logs to understand what happened in some of the cases where text to 9-1-1 was used to contact us. Assessing the successful use of text to 9-1-1 and identifying areas where improvements can be made is made more difficult by the nature of the means of communication itself.

Seventh: giving pre-arrival instructions via text is complicated due to the linear nature of SMS texting in general, so we are considering whether we can provide a text version of those instructions.

Eighth: until such time as the carriers are able to deliver accurate location information for these texts, we need at a minimum to obtain the phone number (if one exists) associated with the text device so that we can better track certain critical appearing non-responses using the exigent circumstances processes in place with the carriers, and those numbers are not uniformly provided by the carriers. Having that phone number made all the difference in the case were we stopped a suicide in progress.

Ninth: we need to identify an effective approach to resolving abandoned texts, assuming for the sake of argument that making a call might increase the danger to the person who generated the text.

We were initially concerned that state law related to false reporting of emergencies might have to be amended, but the manner in which it is written in Vermont is easily construed to cover text messages.

Our foray into public education on text to 9-1-1 has increased awareness of this new service. Our original investment in two radio and two television commercials, and the payment to place those ads on media outlets in the state, has resulted in at least one of the local TV stations running the ads as public service messages after the ad buy ended, and the radio ads are also running as public service messages. We targeted one of the TV spots to the deaf and hard of hearing community, and made a couple of mistakes with that spot, so we are redoing it and will use it on social media sites going forward. In addition, we have contracted with our media consultant to produce three "how to use text to 9-1-1 videos". One is targeted to the older hearing population, who may not be as familiar with using SMS texting, one is targeted to the deaf and hard of hearing community, and the final one is being addressed to the younger generation who are probably most familiar with using SMS texting but may need to understand that SMS texting to 9-1-1 is not to be taken lightly. As those spots are created they are being added to the Vermont 9-1-1 YouTube channel, which can be found at [http://www.youtube.com/channel/UCupWBqM92g5V-3YEixr\\_y\\_Q](http://www.youtube.com/channel/UCupWBqM92g5V-3YEixr_y_Q)

In summary, if we had this to do all over again, we'd do it all over again. It was important to us to know firsthand what would happen as we introduce this new service, and the only way to do that was through trials of the technology. Eighteen months ago, there was a lot of speculation that this service would create unreasonable burdens on the PSAPs and some even predicted text to 9-1-1 would cause more problems than it solved. Even allowing for the fact that the service was not universally available (and still isn't), we don't see the use of text to 9-1-1 replacing voice calls; rather it is a niche service with a specific use. At the same time, it is important to make sure this service is at least widely available, otherwise, efforts to educate the

public run the risk of confusing those citizens who may want to use the service but don't have that service currently provided by the wireless provider to which they subscribe.

We are being careful to market this new service to those individuals who can most benefit: individuals who are deaf or hard of hearing or have speech impairment and individuals who are in a dangerous situation where making a voice call would put them in further danger. We have incorporated the "Call If You Can, Text If You Can't" slogan into a new logo for Vermont 9-1-1, and expect to continue public outreach on this issue for the foreseeable future. For those who worry about the cost of educating the public, we can say that to date we have spent and/or have contracted for slightly less than \$40,000 in services to both produce and run as paid advertising the spots that we have used so far. Most of the initial cost is due to the expense of running television ads in primetime. Our approach going forward is to rely more on social media advertising, because it is easier to target those ads to individuals who might be interested, and those who are interested will click through to the ad because they want to see it. Our social media buy made at the same time as our regular media buy was less than \$500, and we got many views of those same ads on social media.

The picture of how text to 9-1-1 will impact operations in the PSAPs will become clearer as this service is rolled out across the country. By the middle of May, 2014, if not sooner, Vermont will have this service available to over 98% of our population. While the dynamics of doing this in a larger jurisdiction may mean different results, we remain strong proponents of using SMS texting to 9-1-1 and the positive outcomes we have had in a few cases demonstrates that people will use this service, and probably not overuse it, as it rolls out across the country.

Sincerely,

David H. Tucker  
Executive Director  
Enhanced 9-1-1 Board

