



PUBLIC NOTICE

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DA 17-31

Released: January 9, 2017

**PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT ON REQUEST
OF THE STATE OF MAINE PUBLIC UTILITIES COMMISSION TO ADDRESS
DEMARICATION ISSUES RELATED TO THE IMPLEMENTATION OF TEXT-TO-911 VIA
MESSAGE SESSION RELAY PROTOCOL**

PS Docket No. 11-153, PS Docket No. 10-255

Comment Date: February 8, 2017

Reply Comment Date: March 10, 2017

The Public Safety and Homeland Security Bureau seeks comment on a request by the State of Maine Public Utilities Commission (Maine) for assistance in resolving a conflict related to the implementation of text-to-911 via message session relay protocol (MSRP) service in the State of Maine. Specifically, Maine asks for clarification as to the point of demarcation for text-to-911 between wireless providers and Maine's Next Generation 911 (NG911) system.¹

Maine states that as part of its planned migration to NG911, it undertook, on an interim basis, to provide text-to-911 via teletypewriter (TTY) on its legacy Enhanced 911 (E911) platform in order to enable individuals who are hearing impaired or deaf to contact 911. Maine implemented this interim text-to-911 solution at two of the state's Public Safety Answering Points (PSAPs), which were tasked with answering 911 texts for the entire state from the five wireless carriers that provide service in Maine.²

Maine states that in October 2015, following its deployment of a "statewide end-to-end NG911 system," it began "working with wireless carriers and their respective Text Control Centers (TCCs) on migrating from 911 via TTY to 911 to text via MSRP using Maine's National Emergency Number Association (NENA) i3 compliant system."³ Maine states that in response to its deployment request, it received conflicting proposals from two TCCs. One TCC responded to the deployment request with a pricing proposal for Multiprotocol Label Switching (MPLS) connectivity "that included a one-time project charge, monthly recurring charges for a three year contractual period, and recurring monthly costs for dedicated MPLS circuits," all to be paid for by Maine.⁴ Maine regarded the proposed pricing as "unreasonably high,"

¹ Letter from Maria P. Jacques, ENP, Director, Maine Emergency Services Communication Bureau, to David G. Simpson, Chief, Public Safety and Homeland Security Bureau, FCC (November 16, 2016) (Maine Letter), available at https://ecfsapi.fcc.gov/file/111789902143/Text_IPConnectivityDemarcationPoint_ME.pdf.

² *Id.* at 1.

³ *Id.*

⁴ *Id.*

and requested an alternative proposal using a Virtual Private Network (VPN). The TCC then submitted a VPN-based pricing proposal with “recurring monitoring charges.”⁵ The other TCC “expressed a *preference* for connecting via VPN as opposed to MPLS circuits and thus far has not requested compensation for the use of VPN.”⁶

Noting the “disagreement among TCCs about both the preferred technology and the cost of providing text-to-911 via IP,” Maine states that “[t]he root cause of this issue appears to be the point of demarcation between carriers and Maine’s Emergency Services Internet Protocol Network (ESInet).”⁷ Maine believes that “the point of demarcation should be at the ingress designated by the Session Border Controller (SBC) of the State of Maine ESInet,” but contends that the TCCs, “acting on behalf of wireless carriers, argue that the point of demarcation should be the egress side of the SBC used by the TCCs.”⁸

Maine seeks the Commission’s assistance “in resolving this conflict regarding the delivery of interim text-to-911 via MSRP by clarifying where the point of demarcation is between wireless providers and Maine’s NG911 network in order to appropriately assess costs.”⁹ In support of its proposed demarcation point definition, Maine cites the FCC’s 2001 *King County* decision, which identified the demarcation point between wireless service providers and PSAPs in the legacy E911 environment as the input to the 911 selective router.¹⁰ Maine asserts that “in the NG 911 environment, the equivalent to the E911 Selective Router would be the State ESInet SBC, not the TCC’s SBC.”¹¹ Maine further states that “it is not Maine’s NG911 system that requires a TCC with interim text functionality; rather, the need arises from a limitation of the wireless carriers’ native networks, [thus, if] the wireless carriers were able to provide a Session Initiation Protocol (SIP) message complete with location directly to the State’s network, the network would be capable of routing the SIP message to the appropriate PSAP via its own SBC.”¹² Maine concedes that “any costs beyond the edge of the ESInet are the responsibility of the State (911 Authority),” but asserts that “it should be the wireless carriers’ responsibility to carry the cost of delivering text-to-911 for their customers to our network, just as the carriers are required to do for regular 911 service.”¹³

We seek comment on Maine’s request for clarification regarding the appropriate point of demarcation between wireless providers and Maine’s NG911 network in order to appropriately assess costs for provision of text-to-911, and on the applicability of the *King County* decision to this issue. We also seek comment on whether any demarcation point identified for text-to-911 could be generally applied to future multimedia communication (e.g., delivery of photos, video, and other data) in the NG911 environment.

⁵ *Id.* at 1-2. Maine states that the TCC proposed monitoring charges “to help compensate for what the company views as a less than reliable service because it traverses the Internet.” *Id.*

⁶ *Id.* (emphasis in original).

⁷ *Id.* at 2.

⁸ *Id.*

⁹ *Id.*

¹⁰ See Letter from Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau, FCC, to Maryl R. Davis, E911 Program Manager, King County E-911 Program Office, (WTB May 7, 2001), 2001 WL 491934; *In the Matter of Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request of King County, Washington*, Order on Reconsideration, 17 FCC Rcd 14789, para. 3 (2002).

¹¹ Maine Letter at 2.

¹² *Id.*

¹³ *Id.*

Procedural Matters

Pursuant to sections 1.415 and 1.419 of the Commission's rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS). All comments must reference PS Docket No. 11-153. *See Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <http://apps.fcc.gov/ecfs/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th St., SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

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For further information regarding this matter, contact Timothy May, Policy and Licensing Division, Public Safety and Homeland Security Bureau at 202-418-1463 or timothy.may@fcc.gov.

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