

**STATEMENT OF  
COMMISSIONER MIGNON L. CLYBURN**

*Re: Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications;  
Framework for Next Generation 911 Deployment, PS Docket Nos. 11-153, 10-255*

This NPRM takes a proper approach toward promoting the development and deployment of NG9-1-1 technology. American ingenuity and investment in broadband IP networks and applications, has already led to innovations that could greatly improve public safety communications. These innovations include M2M communications, such as environmental sensors, which can detect chemical spills, and gunshot sensors, to improve law enforcement response to crimes.

It is important that we do all we can to accelerate the ability of PSAPs to receive the most advanced multi-media services IP technology can provide. But, as this item explains, we must thoughtfully evaluate the challenges our Nation will face, as our emergency communications services attempt to leverage the advanced features of IP based networks. PSAPs, like all other local government agencies, must carefully manage their budgets, and upgrading to IP networks can impose significant costs. Also complicating the matter, is that there are over 6,800 PSAPs nationwide, and each has varying resources and timetables for improving their operational capability.

The challenges PSAPs face become even more difficult during large scale catastrophes. As the item explains, the August 23, 2011 East Coast earthquake and Hurricane Irene demonstrated, that concentrated demands on the capacity of commercial communications networks, hindered the ability of consumers to make voice calls. It is not realistic to expect all PSAPs to immediately manage the demands, that come with handling the most advanced IP multi-media services, when many PSAPs are having trouble handling voice traffic during large scale disasters.

This NPRM balances the interests of advancing emergency communications by allowing PSAPs to manage their resources for their needs. It begins by charting a development path for three classes of text-capable communications -- Short Message Service (SMS), IP-based messaging, and Real-Time Text (RTT). We should establish the proper policies necessary, to help more PSAPs receive and use text messages, before asking them to take on the expense required to manage the more complex and advanced IP technologies too quickly. It is also reasonable to try to identify short term and long term goals, in developing a national plan, for transitioning PSAPs to NG9-1-1 technologies. The cost model white paper should help the FCC measure the costs and benefits of any approach it considers to promote NG9-1-1 technologies.

I was particularly pleased to see, that the item devotes so much attention, to properly educating consumers about what types of communications PSAPs can receive. For those consumers who prefer to text an emergency message, it is critical that they know if the PSAP they are trying to contact can accept text messages. All stakeholders should take an approach that welcomes the most creative ideas on this issue. I applaud the staffs of the FCC and FEMA, for releasing, yesterday, a consumer tip sheet to inform consumers of the current limitations of PSAPs to receive text messages, and to provide other advice.

When it comes to educating consumers that PSAPs may not be able to receive their emails or texts, it seems to me that commercial service providers, and handset manufacturers, will play particularly important roles. They interact most often with consumers and they have

considerable experience with measuring consumer expectation. Also, to the extent that part of the solution involves having service providers and handset manufacturers play a direct role in educating consumers, these entities know the most cost effective manner, for their companies, to provide education tools. I hope that commercial service providers, will work with the public safety community and consumer advocates, to help us craft the most cost effective campaign possible to educate consumers about the best ways to send emergency communications.

I commend Chairman Genachowski, Admiral Barnett, and the staff of the Public Safety Homeland Security Bureau, for exploring aerial communications platforms, and other innovations, to enhance emergency preparedness. Although we should continue to improve the reliability of legacy and broadband networks, we must also prepare for the reality that, despite best efforts, networks will go out of service. Aerial platforms can provide rapid response solutions to temporarily restore critical communications. The military has successfully used a number of aerial solutions that are deployable within the first 12-18 hours of a disaster. I understand there may be technical and coordination issues when using these various solutions with commercial networks. I hope the relevant stakeholders can help us address these issues and arrive at a workable solution.

The FCC is also showing leadership by holding a technology demonstration to draw attention to the latest innovations for providing emergency communications. Welcome to all those entities who are taking part in the demonstration.