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September 27, 2016

Marlene Dortch
Secretary

Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte*, CG Docket No. 16-145

Dear Ms. Dortch:

On September 23, representatives from the Association of Public-Safety Communications Officials (APCO) International met in person and via telephone with representatives of the National Association of State 9-1-1 Administrators (NASNA) and the Commission's Office of Strategic Planning & Policy Analysis (OSP), Public Safety & Homeland Security Bureau (PSHSB), and Consumer and Governmental Affairs Bureau (CGB). The purpose of the meeting was to discuss issues related to Real-Time Text (RTT) raised by the Commission's Notice of Proposed Rulemaking (NPRM) released May 25, 2016, in the above-referenced docket.¹

APCO reiterated that RTT has the potential to enable faster, more robust text communications with 9-1-1 than TTY or SMS, but its support for implementation of RTT is contingent upon compatibility with TTY and existing IP-based solutions, to the extent Public Safety Answering Points (PSAPs) have adopted them.² APCO also re-emphasized the need to ensure interoperability to avoid the challenge of integrating different solutions and interfaces.

The parties also discussed additional RTT delivery options that would complement existing methods for SMS-to-911, as well as the relationship of this proceeding to the FCC's Third Further Notice of Proposed Rulemaking

¹ Transition from TTY to Real-Time Text Technology et al., Notice of Proposed Rulemaking, FCC 16-53, CG Docket No. 16-145, GN Docket No. 15-178 (rel. Apr. 29, 2016) (NPRM), available at

https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-53A1.pdf.

² Comments of APCO International, Transition from TTY to Real-Time Text Technology et al., available at

<https://ecfsapi.fcc.gov/file/107111379403276/APCO%20Comments%20RTT%20TTY%207-11-16.pdf>.

on text-to-911, which addresses issues including location information, roaming, and future texting services such as RTT.³

Respectfully submitted,

/s/

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CC (via email):

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Michael Scott, Attorney Advisor, Disability Rights Division (CGB)
David Furth, Deputy Bureau Chief, Office of the Bureau Chief (PSHSB)
Brenda Boykin, Attorney Advisor, (PSHSB)

³ Federal Communications Commission, *Third Further Notice of Proposed Rulemaking, Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*, FCC 14-118 (rel. Aug. 13, 2014) available at <https://ecfsapi.fcc.gov/file/7521759391.pdf>.