



Text Messages in a PSAP Environment

APCO Emerging Technologies

07/30/2012

Overview of the technology currently in use to facilitate text messages into a PSAP environment. Discuss the status of interim options and provide example deployments and the potential human and operational aspects of the options and deployments.

Acknowledgements*

Special recognition to the committee members that provided the pertinent research needed to successfully create this white paper. At the time this version was written, the APCO Emerging Technologies Committee (ET), sub-committee on Text Messages into a PSAP Environment included the following membership:

Richard Boettcher, ET Group Leader
Director, Administrative Services Division
North Andover Police Department

Jim Coleman, ET Chair
Washington Parish Communications District

Patrick Cutts, ET Vice-Chair
Communications Operations Manager
Scottsdale Police Department

Karen Allen
Communications Administrator
Tempe Police Department

Ron Bloom
Managing Director
PSAP Concepts & Solutions, LLC

Guy Clinch
Senior Solution Manger
Avaya

Robert Ehrlich
Telecommunication Systems, Inc. (TCS)
Central Islip/Hauppauge VAS

Barry Furey
Director
Raleigh-Wake 9-1-1 Center

Richard Jones
Operations Issues Director
NENA

Todd Piett, ENP
Chief Product Officer
Rave Mobile Safety

Pam Provost
Administrator
Kachemak Consulting

Jason Rice
Communications Supervisor
Monongalia Emergency Centralized
Communications Agency

David Thomas
Director of Info Technology & Communications
Sandoval County

Daniel Zacek
Chief Technology Officer
9-1-1 Labs, Inc

Kathy McMahan
Technical Services Manager
APCO International

Crystal McDuffie
Communications Center & 9-1-1 Services
APCO International

Steve Willoughby, ENP
Director, 9-1-1 & Public Safety Division
Association of Central Oklahoma Governments

Stephen Wisely
Director
APCO International Comm Center & 9-1-1
Services

2 **Acronyms and Abbreviations***

3 For the purpose of this white paper, the following definitions of acronyms and abbreviations
4 apply:

5

| | | |
|----|---------------|---|
| 6 | APCO | Association of Public-Safety Communications Officials |
| 7 | API | Application Programming Interface |
| 8 | CSC | Common Short Code |
| 9 | CSCA | Common Short Code Administrator |
| 10 | CTI | Computer Telephony Integration |
| 11 | CTIA | Cellular Telecommunications & Inter Association |
| 12 | E9-1-1 | Enhanced 9-1-1 |
| 13 | EENA | European Emergency Number Association |
| 14 | IETF | Internet Engineering Task Force |
| 15 | IM | Instant Messaging |
| 16 | MO | Mobile Originating |
| 17 | MT | Mobile Terminated |
| 18 | NENA | National Emergency Number Association |
| 19 | OSI | Open System Interconnection |
| 20 | PSAP | Public Safety Answering Point |
| 21 | RTT | Real-Time Text |
| 22 | SIP | Session Initiation Protocol |
| 23 | SMPP | Short Message Peer-to-Peer |
| 24 | SMS | Short Message Service |
| 25 | SMSC | Short Message Service Center |
| 26 | SMTP | Simple Mail Transfer Protocol |
| 27 | TCP | Transmission Control Protocol |
| 28 | TDD | Telecommunication Device for the Deaf |

| | | |
|----|-------------|------------------------------|
| 29 | ToIP | Text over Internet Protocol |
| 30 | TRS | Text Relay Service |
| 31 | TTY | Teletypewriter |
| 32 | UDP | User Datagram Protocol |
| 33 | VoIP | Voice over Internet Protocol |
| 34 | WPH1 | Wireless, Phase 1 |
| 35 | WPH2 | Wireless, Phase 2 |
| 36 | WRLS | Wireless, Phase 0 |
| 37 | | |
| 38 | | |
| 39 | | |
| 40 | | |
| 41 | | |
| 42 | | |
| 43 | | |
| 44 | | |
| 45 | | |
| 46 | | |
| 47 | | |
| 48 | | |
| 49 | | |
| 50 | | |
| 51 | | |
| 52 | | |
| 53 | | |
| 54 | | |

| | | |
|----|--|----|
| 55 | Contents | |
| 56 | Acknowledgements* | 2 |
| 57 | Acronyms and Abbreviations* | 3 |
| 58 | Introduction | 6 |
| 59 | Scope | 6 |
| 60 | Background Information..... | 6 |
| 61 | Definitions..... | 7 |
| 62 | Driving the Need for Text-to-9-1-1..... | 12 |
| 63 | Why do we need to look at enabling Text-to-9-1-1?..... | 13 |
| 64 | Technology Overview | 13 |
| 65 | SMS..... | 13 |
| 66 | SMS via 10-digit long code..... | 14 |
| 67 | Text to TTY | 15 |
| 68 | SMS via 4, 5, or 6-digit short codes | 15 |
| 69 | SMS to 9-1-1..... | 16 |
| 70 | SMS Location determination..... | 16 |
| 71 | Text to 9-1-1 via Third Party Relay Service | 16 |
| 72 | RTT..... | 17 |
| 73 | Status of Interim Options..... | 17 |
| 74 | Text to TTY | 17 |
| 75 | SMS via 4, 5, or 6-digit short codes | 18 |
| 76 | SMS to 9-1-1..... | 18 |
| 77 | Text to 9-1-1 via Third Party Relay Service | 20 |
| 78 | RTT..... | 20 |
| 79 | Europe’s REACH112 project..... | 20 |
| 80 | Text Messaging Vulnerability..... | 21 |
| 81 | Human and Operational Aspects of NG 9-1-1..... | 22 |
| 82 | Summary of Operational Learnings..... | 24 |
| 83 | | |

84 **Introduction**

85 **Scope**

86 This paper evaluates various interim 9-1-1 text solutions, including the technology, operational
87 implications and lessons learned from early deployments. The intent of this paper is to provide the
88 reader with an overview of current text technologies that should be considered for eventual Next
89 Generation 9-1-1 (NG9-1-1) solutions. However, the questions involving other multimedia (e.g. picture,
90 video messaging, or over the top applications) and other associated technology are not addressed at this
91 time. While TTY/TDD is delivered in both ASCII and Baudot formats the interim solution to deliver text
92 to 9-1-1 via TTY/TDD focus on Baudot.

93 **Background Information**

94 Text messaging is a form of non-verbal communication between two entities via an electronic interface,
95 most commonly a mobile electronic device. In the public safety context, the communication may be
96 conducted in any number of formats, including Teletypewriter (TTY), Telephone Device for the Deaf
97 (TDD), Short Message Service (SMS), Instant Messaging (IM), or Real-time Text (RTT). Each of these
98 formats has unique attributes; however, all provide the ability for a caller to communicate non-verbally
99 with a 9-1-1 call taker. In today's E9-1-1 infrastructure sending a text message from a mobile device
100 direct to a PSAP is not supported.¹

101
102 On June 9, 2009, the Black Hawk County Iowa 9-1-1 Service Board announced that the Black Hawk
103 Consolidated Public Safety Communications Center became the first PSAP to "successfully receive text
104 messages sent directly to 9-1-1".² Through cooperation between several vendors, the PSAP was able to
105 incorporate text messaging into their facility. However, their efforts were focused mainly on those with
106 speech and hearing impairments and cautioned that "a voice call remains the best way to contact 9-1-
107 1."³ It is important to note that the ability to text to 9-1-1 is limited to a single wireless carrier and
108 currently does not facilitate automatic location information in the form of an address as a landline call
109 or WPH2 latitude/longitude data of wireless devices.

110
111 On August 3, 2011, the Durham Emergency Communications Center (DECC) became the second PSAP in
112 the country to implement a text-to-9-1-1 solution for a six-month trial. The implementation involved
113 only a single wireless carrier. In order to send a text to DECC, the "customer must be in range of cell
114 towers in the Durham County area".⁴

115
116 While both instances of an implementation of a text-to-9-1-1 solution are outstanding achievements,
117 public safety stakeholders, both public and private, are still faced with the conundrum of trying to
118 identify and implement solutions that are workable on a national scale.

119
120 On May 4, 2012, Verizon announced that, in cooperation with Telecommunication Systems, beginning as
121 early as 2013, it is planning to launch SMS-to-9-1-1 service nationwide.⁵ This is the first major step by
122 private companies working to provide this technology. At first, this will only be offered to select PSAPs,

¹ <http://www.ravemobilesafety.com/public/smart911.html>

² http://www.racom.net/newsletter_files/Press_release_6_8_09.pdf

³ Ibid

⁴ <http://www.newsobserver.com/2011/08/03/1388411/durham-verizon-customers-can-now.html>

⁵ See *Text-to-911 moves ahead in the US as Verizon chooses partner vendor*, published by arstechnica (dated May 4, 2012), available at <http://arstechnica.com/business/2012/05/next-generation-911-moves-ahead-as-verizon-choose-partner-vendor/>

123 using its existing CDMA SMS network for 9-1-1 text notifications and only to Verizon wireless customers
124 with a text-capable phone and service plan.⁶

125 To increase flexibility for the PSAPs, the program will be offered in three different methods:

- 126 • Client Backend delivering content to a PSAP via a secure web browser.
- 127 • Client API to support existing CPE equipment required by PSAPs.
- 128 • ToIP/TTY Gateway connectivity.

129 **Definitions**

130 **Application Programming Interface (API)** - is a source code-based specification intended to be used as
131 an interface by software components to communicate with each other. An API may include
132 specifications for routines, data structures, object classes, and variables. API is an essential feature too.
133 An API specification can take many forms.

134 **Common Short Codes (CSC)** - are short numeric codes to which text messages can be addressed from a
135 wireless device. Common short codes are easy to remember and they are compatible across all
136 participating carriers. CSCs are either five-digit or six-digit numbers and can be leased by anyone
137 interested in interacting with over 200 million wireless consumers.

138 Wireless subscribers send text messages to short codes to access a wide variety of mobile content for
139 delivery to their wireless devices. Applications of CSCs include sweepstakes, tele-voting campaigns,
140 mobile coupons, in venue, and other promotions as well as a wide range of additional interactive
141 wireless services.⁷

142 **Common Short Codes Administrator (CSCA)** – CTIA administers common short codes

143 **Computer Telephony Integration (CTI)** - involves integrating computer systems with telephony
144 resources to augment an organization's communications capabilities. In the last several years, the
145 definition of CTI has grown to include call routing, the integration of multiple media channels—such as
146 Web, voice, and e-mail—and integration with interactive voice response (IVR) units.⁸

147
148 **Cellular Telecommunications & Inter Association (CTIA)** - CTIA-The Wireless Association® is an
149 international nonprofit membership organization that has represented the wireless communications
150 industry since 1984. Membership in the association includes wireless carriers and their suppliers, as well
151 as providers and manufacturers of wireless data services and products. The association advocates on
152 behalf of its members at all levels of government. CTIA also coordinates the industry's voluntary efforts
153 to provide consumers with a variety of choices and information regarding their wireless products and
154 services. This includes the voluntary industry guidelines; programs that promote mobile device recycling
155 and reusing; and wireless accessibility for individuals with disabilities.

156

⁶ See *Verizon Selects Telecommunications Systems to Provide Text to 911 National Gateway Solution*, published by PR Newswire (dated May 3, 2012), available at <https://www.prnewswire.com/news-releases/verizon-selects-telecommunication-ssystems-to-provide-text-to-911-national-gateway-solution-150048385.html>

⁷ http://www.ctia.org/business_resources/short_code/

⁸ http://www.cisco.com/en/US/products/sw/custcosw/ps427/products_white_paper09186a00801da678.shtml

157 **E9-1-1** – The E9-1-1 feature provides Enhanced 9-1-1 service capabilities and optional PSAP customer
158 services for completing and handling 9-1-1 calls. It provides the capability for the E9-1-1 tandem office
159 to serve several PSAPs within the E9-1-1 service area. The main characteristic of E9-1-1 service is the
160 capability of the E9-1-1 tandem office to selectively route a 9-1-1 call originated from any station in the
161 E9-1-1 service area to the correct primary (or controlling) PSAP designated to serve the originating
162 station’s location.⁹

163
164 **Emergency Services IP Network (ESInet)** – An ESInet is a managed IP network that is used for
165 emergency services communications, and which can be shared by all public safety agencies. It provides
166 the IP transport infrastructure up which independent application platforms and core functional
167 processes can be deployed, including, but not restricted to, those necessary for providing NG9-1-1
168 services. ESInets may be constructed from a mix of dedicated and shared facilities. ESInets may be
169 interconnected at local, regional, state, federal, national and international levels to form an IP-based
170 inter-network (network of networks).¹⁰

171
172 **Internet Engineering Task Force (IETF)** - The mission of the IETF is to make the Internet work better by
173 producing high quality, relevant technical documents that influence the way people design, use, and
174 manage the Internet.¹¹

175
176 **Instant Messaging (IM)** – refers to the transfer of messages between users in near real-time. These
177 messages are usually, but not required to be, short. IMs are often used in a conversational mode, that
178 is, the transfer of messages back and forth is fast enough for participants to maintain an interactive
179 conversation.¹²

180
181 **In Network** – with the network coverage area

182 **Internet Protocol (IP)** - is the method or protocol by which data is sent from one computer to another
183 on the Internet. Each computer (known as a host) on the Internet has at least one IP address that
184 uniquely identifies it from all other computers on the Internet. When you send or receive data (for
185 example, an e-mail note or a Web page), the message gets divided into little chunks called packets. Each
186 of these packets contains both the sender's Internet address and the receiver's address. Any packet is
187 sent first to a gateway computer that understands a small part of the Internet. The gateway computer
188 reads the destination address and forwards the packet to an adjacent gateway that in turn reads the
189 destination address and so forth across the Internet until one gateway recognizes the packet as
190 belonging to a computer within its immediate neighborhood or domain. That gateway then forwards the
191 packet directly to the computer whose address is specified.¹³

192 **Mobile Originating (MO)** – messages sent **by** a mobile handset

193
194 **Mobile Terminated (MT)** – messages sent **to** a mobile handset

⁹ http://www.nena.org/resource/collection/6366E817-C855-4776-AF3A-F9F715D1AF12/NENA_04-001-v1_E9-1-1_PSAP_Equipment.pdf

¹⁰ See NENA Master Glossary of 9-1-1 Terminology, NENA 00-001, Version 16, August 22, 2011 at page 45. Available at http://www.nena.org/resource/resmgr/Standards/NENA_00-001_V16.pdf?hhSearchTerms=definition+and+of+and+ESInet

¹¹ <http://www.ietf.org/>

¹² <http://www.ietf.org/rfc/rfc3428.txt>

¹³ <http://searchunifiedcommunications.techtarget.com/definition/Internet-Protocol>

195
196 **Next Generation 9-1-1 (NG9-1-1)** - A system comprised of hardware, software, data and operational
197 policies and procedures to:

- 198 • Provide standardized interfaces from call and messaging services
- 199 • Process all types of emergency calls including non-voice (multimedia) messages
- 200 • Acquire and integrate additional data useful to call routing and handling
- 201 • Deliver the calls/messages and data to the appropriate PSAPs and other appropriate emergency
202 entities
- 203 • Support data and communications needs for coordinated incident response and management¹⁴

204

205 **OSI Transport Layer (Open System Interconnection)** - The transport layer ensures that messages are
206 delivered error-free, in sequence, and with no losses or duplications. It relieves the higher layer
207 protocols from any concern with the transfer of data between them and their peers. Typically, the
208 transport layer can accept relatively large messages, but there are strict message size limits imposed by
209 the network (or lower) layer. Consequently, the transport layer must break up the messages into smaller
210 units, or frames, prepending a header to each frame.¹⁵

211

212 **Public Safety Answering Point (PSAP)** - A facility equipped and staffed to receive emergency and non-
213 emergency calls requesting public safety services via telephone and other communication devices.
214 Emergency calls are first answered, assessed, classified, and prioritized. The FCC further defines a
215 primary PSAP as a facility to which 9-1-1 calls are routed directly from the 9-1-1 Control Office. A
216 secondary PSAP is defined as a facility to which 9-1-1 calls are transferred from a primary PSAP.

217

218 **REACH112 (Responding to All Citizens needing Help)** - a project partially funded by the European
219 Commission under the Information and Communication Technologies Policy Support Programme (ICT
220 PSP). It represents partners from all over Europe, including user organizations and major global
221 telecommunications companies. In five countries, it will deploy a new communication solution to allow
222 people to communicate in video, voice and text simultaneously, with special focus on people with
223 disabilities. The project will offer access to relay services to help connecting users with different abilities
224 to others and will also provide access to the emergency services. Ultimately the service will benefit all
225 citizens.¹⁶

226

227 **RFC4103** - defines a payload type for carrying text conversation session contents in RTP [2] packets.
228 Text conversation is used alone or in connection with other conversational facilities, such as video and
229 voice, to form multimedia conversation services. Text in multimedia conversation sessions is sent
230 character-by-character as soon as it is available, or with a small delay for buffering. The text is intended
231 to be entered by human users from a keyboard, handwriting recognition, voice recognition or any other
232 input method.¹⁷

233

234 **Real-Time Text (RTT)** – Conversational text that is sent and received on a character by character basis.
235 The characters are sent immediately (in a fraction of a second) once typed and are also displayed

¹⁴ <http://www.topcompinc.com/NG%209-1-1/NENA%20NG911%20Standards.pdf>

¹⁵ <http://support.microsoft.com/kb/103884>

¹⁶ http://ec.europa.eu/information_society/activities/ict_esp/projects/portfolio/h3_documents/reach_112.pdf

¹⁷ http://datatracker.ietf.org/doc/rfc4103/?include_text=1

236 immediately to the receiving person(s). This allows text to be used in the same conversational mode as
237 voice.¹⁸

238
239 **Real-Time Transport Protocol (RTP)** - provides end-to-end network transport functions suitable for
240 applications transmitting real-time data, such as audio, video or simulation data, over multicast or
241 unicast network services. RTP does not address resource reservation and does not guarantee quality-of-
242 service for real-time services.¹⁹

243
244 **Session Initiation Protocol (SIP)** is an IETF-defined signaling protocol widely used for
245 controlling communication sessions such as voice and video calls over Internet Protocol (IP). The
246 protocol can be used for creating, modifying and terminating two-party (unicast) or multiparty
247 (multicast) sessions. Sessions may consist of one or several media streams.

248
249 **Short Codes** – See Common Short Codes.

250
251 **Short Message Peer-to-Peer (SMPP)** – An open, industry-standard protocol for sending text message
252 (SMS) data over the internet. It is used primarily for connecting third-party services with SMS centers,
253 enabling various types of automated SMS services. It is also used to link SMS center gateways, enabling
254 inter-carrier messaging.²⁰

255
256 **Short Message Service (SMS)** – Enables users to send and receive short text messages (usually about
257 140-160 characters) on wireless handsets. Usually referred to as “text messaging” or “texting”.²¹
258 Although SMS is commonly used for Mobile to Mobile messages, it is also used today to send messages
259 across multiple paths such as from a mobile device to a personal computer or other endpoints. For
260 instance, in an SMS to E9-1-1 scenario, the path would typically be to / from a mobile device to a
261 telecommunicator at the PSAP.

262
263 **Short Message Service Center (SMSC)** – acts as a centralized store-and-forward device that accepts
264 messages and buffers or retains those messages until a suitable deliver time (i.e., the cell phone is
265 powered on and the location known).²²

266
267 **Simple Mail Transfer Protocol (SMTP)** – A set of commands that authenticate and direct the transfer of
268 electronic mail from one mail server to a receiving server.²³

269
270 **Spoofing** – (A) The process of deception by which an individual or system alters its identity or creates
271 additional identities, thereby causing another person or system to act incorrectly. (B) The process of
272 deception by which an unauthorized person causes a transmission or message to appear to come from
273 an authorized user in order to gain privileged access to computer or network resources. IP spoofing, an
274 integral element of many types of network attacks, involves creating TCP/IP packets that use false
275 addresses, perhaps stolen from others. (C) The process of deception by which a system alters its
276 identify or creates additional identities, to impersonate another device in a communications session or

¹⁸ <http://www.realtimetext.org/index.php?pagina=27>

¹⁹ <http://www.ietf.org/rfc/rfc1889.txt>

²⁰ <http://www.phonescoop.com/glossary/term.php?gid=257>

²¹ <http://www.ctia.org/advocacy/research/index.cfm/AID/10406>

²² http://www.ncs.gov/library/tech_bulletins/2003/tib_03-2.pdf

²³ <http://www.sharpened.net/glossary/definition/smt>

277 transaction.²⁴ [See also “The Trouble with Spoofing: How manipulating caller ID Harms 9-1-1,”
278 originally published in *Public Safety Communications, Vol. 75 (5): 42-43, May 2009.*]²⁵

279
280 **Telecommunicator** - The individual employed by a public safety agency as the first of the first
281 responders whose primary responsibility is to receive, process, transmit, and/or dispatch emergency
282 and non-emergency calls for law enforcement, fire, emergency medical, and other public safety services
283 via telephone, radio, and other communication devices.

284
285 **Teletypewriter (TTY)** – also known as **Telecommunication Device for the Deaf (TDD)**, is a device capable
286 of information interchange between compatible units using a dial up or private-line telephone network
287 connection as the transmission medium. ASCII or Baudot codes are used by these units.²⁶

288
289 **Ten Digit Long Code** – are voice, SMS and fax enabled. They can be accessed from a mobile device,
290 landline, chat window, email or web-based application.²⁷ These are in the format of NPA-NXX-XXXX
291 (ITU-T E.164 [International Dialing Plan] or ATIS-0300076 [The North American Numbering and Dialing
292 Plan]). Although it has seen limited use, this format is being discontinued in favor of SMS Short Codes.

293
294 **Text Relay Service (TRS)** – A telephone transmission service that provides the ability for an individual
295 who has a hearing or speech disability to engage in communication by wire or radio with a hearing
296 individual in a manner that is functionally equivalent to the ability of an individual who does not have a
297 hearing or speech disability to communicate using voice communications services by wire or radio. Such
298 term includes services that enable two-way communication between an individual who uses a text
299 telephone or other non-voice terminal device and an individual who does not use such a device, speech-
300 to-speech services, video relay services and non-English relay services.²⁸

301
302 **Transaction Mode** – a SMSC may provide this option, where a transmission/text is tried only once,
303 returning proof of delivery as part of the process.

304
305 **Transmission Control Protocol (TCP)** - is a transport layer protocol used by applications that require
306 guaranteed delivery. It is a sliding window protocol that provides handling for both timeouts and
307 retransmissions. TCP establishes a full duplex virtual connection between two endpoints. Each endpoint
308 is defined by an IP address and a TCP port number. The operation of TCP is implemented as a finite state
309 machine. The byte stream is transferred in segments. The window size determines the number of bytes
310 of data that can be sent before an acknowledgement from the receiver is necessary.²⁹

311
312 **User Datagram Protocol (UDP)** - is defined to make available a datagram mode of packet-switched
313 computer communication in the environment of an interconnected set of computer networks.
314 This protocol assumes that the Internet Protocol (IP) is used as the underlying protocol. This protocol
315 provides a procedure for application programs to send messages to other programs with a minimum of
316 protocol mechanism. The protocol is transaction oriented, and delivery and duplicate protection are not

²⁴ <http://computer.yourdictionary.com/spoofing>

²⁵ <http://psc.apcointl.org/2011/03/17/the-trouble-with-spoofing/>

²⁶ <http://www.apcointl.com/new/commcenter911/downloads/ADA-TDDTrainingStandard.pdf>

²⁷ <http://www.mobilemarketingunlimited.net/mobile-marketing-411/long-codes-versus-short-codes/>

²⁸ <http://transition.fcc.gov/cgb/dro/4regs.html>

²⁹ <http://www.networksorcery.com/enp/protocol/tcp.htm>

317 guaranteed. Applications requiring ordered reliable delivery of streams of data should use the
318 Transmission Control Protocol (TCP).³⁰

319
320 **Voice over Internet Protocol (VoIP)** - a technology that allows you to make voice calls using a
321 broadband Internet connection instead of a regular (or analog) phone line. Some VoIP services may only
322 allow you to call other people using the same service, but others may allow you to call anyone who has a
323 telephone number - including local, long distance, mobile, and international numbers. Also, while some
324 VoIP services only work over your computer or a special VoIP phone, other services allow you to use a
325 traditional phone connected to a VoIP adapter.³¹

326
327 **Driving the Need for Text-to-9-1-1**

328
329 Text messaging is the most common non-voice application via mobile devices used today. The average
330 person sends 41.5 messages per day, up from the 29.7 messages per day in 2009. If you then consider
331 those 18-24 years old, the average messages per day rises to 109.5, or 3,200 per month. At the same
332 time, the number of voice calls, made or received, via cell phone has remained steady at approximately
333 12.3 calls per day.³² Data presented by Neustar suggests that over 72% of wireless users have paid for
334 SMS packages and 57% of those over the age of 13 are considered regular text message users.

335
336 According to CTIA statistics³³ (referenced in Figure 1 below), the number of SMS text messages has
337 increased to 2.30 trillion messages per year. Additionally, nearly 32% of households in the United States
338 have completely “cut the cord”, relying solely on mobile devices for telephone service – an over 400%
339 increase compared to six years ago.

340



| | Dec-11 | Dec-06 | Dec-01 | Dec-96 |
|---|--------|--------|---------|--------|
| Wireless Subscriber Connections | 331.6M | 233.0M | 128.4M | 44.0M |
| Wireless-Only Households (% of U.S. Households) | 31.6% | 10.5% | N/A | N/A |
| Annualized Minutes of Use | 2.29T | 1.96T | 456.96B | 51.97B |
| Annualized Yearly Text Messages | 2.30T | 158.6B | N/A | N/A |
| E-911 Calls Per Day | >400K | 260K | 139K | 55K |

341

342

343 **Figure 1**

344 In a 2010 study conducted by the American Red Cross, 52% of respondents indicated they would send a
345 text message to a response agency if it were available.³⁴ The number of respondents who would send a
346 text message increases to 66% for those aged 18-34. To bring another perspective to the proliferation

³⁰ <http://tools.ietf.org/html/rfc768>

³¹ <http://www.fcc.gov/encyclopedia/voice-over-internet-protocol-voip>

³² <http://pewinternet.org/Reports/2011/Cell-Phone-Texting-2011/Main-Report/How-Americans-Use-Text-Messaging.aspx>

³³ <http://www.ctia.org/advocacy/research/index.cfm/AID/10323>

³⁴ <http://www.redcross.org/www-files/Documents/pdf/other/SocialMediaSlideDeck.pdf>

347 of mobile devices, the global mobile data traffic in 2011 was over eight times greater than the total
348 global internet traffic in 2000.³⁵

349 **Why do we need to look at enabling Text-to-9-1-1?**

350 NG9-1-1 defines an infrastructure for multi-media communication with 9-1-1, but broad deployment of
351 NG9-1-1 networks is years away. Even after network deployment, changes will have to be made to
352 wireless carrier networks to facilitate delivering text messages into those networks in the manner
353 prescribed by NG9-1-1.

354
355 The hearing and speech impaired communities are not able to effectively communicate via a mobile
356 device with emergency services today. They represent a population of 54.4³⁶ million citizens who are
357 not being provided parity of access to emergency services.

358 Situations also occur wherein a caller is not able to initiate a voice call to 9-1-1. Silent witness type
359 scenarios represent valid use cases for text-to-9-1-1 outside the hearing and speech impaired
360 communities. For example, Iceland's 112 system, while deployed for the speech and hearing impaired
361 communities, has been used to alert the police when people have been in cars where drugs are being
362 sold and by people being subjected to domestic violence.

363 As text messaging becomes a standard communication tool, citizens increasingly expect to be able to
364 send messages via text to 9-1-1.

365 **Technology Overview**

366 **SMS**

367 Short Message Service (SMS) allows the exchange of short messages between a mobile station and the
368 wireless system, and between the wireless system and an external device capable of transmitting and
369 optionally receiving short messages. The external device may be a voice telephone, a data terminal or a
370 short message entry system.³⁷ The term 'SMS' has become synonymous for all types of text messaging
371 as 'texting' has become more and more commonplace and accepted in today's society.

372
373 SMS Detailed Methodology: Typically, Mobile Originated messages are sent from a handset via a
374 carrier's network. The carrier network includes a Short message service center (SMSC) which provides a
375 "store and forward" mechanism. The SMSC "stores" the message received and then attempts to
376 "forward" that message to the intended recipient, also via the carrier network. The majority of SMS
377 messages not delivered on a first attempt are because the phone is unreachable (e.g. turned off or
378 temporarily off the network), not because of network congestion or failure as is commonly believed.
379 Messages that are not delivered on the first attempt enter into a robust SMSC retry mechanism, which
380 delivers the message as soon as the recipient becomes available. This proven method ensures that the
381 vast majority of messages will be retransmitted and received successfully.

382 There has been a great deal of discussion, and even controversy, surrounding the reliability and
383 resilience of SMS as a means to communicate a 9-1-1 emergency request. SMS delivery, while

³⁵ http://www.cisco.com/en/US/solutions/collateral/ns341/ns525/ns537/ns705/ns827/white_paper_c11-520862.html

³⁶ <http://www.census.gov/prod/2008pubs/p70-117.pdf>

³⁷ See *Short Message Service TIA/EIA-637-A, by 3rd Generation Partnership Project 2 "3GPP2" [3GPPS C.S0015-0]* available at http://www.3gpp2.org/public_html/specs/CS0015-0.pdf

384 considered a "best effort", has shown that the complete loss of a message is practically nonexistent and
385 message delays are uncommon, typically affecting less than 1% of messages.³⁸ Of interest to the PSAP
386 community though, is that in an SMS to PSAP scenario, both the sending and receiving devices would, by
387 definition, be "on," "in network", and "not blocked" since the entire emergency scenario begins with a
388 person successfully texting for emergency support. By successfully texting an initial message to the
389 PSAP, the sender ensures that their phone is on and network coverage is available.

390 If the carrier chooses to do so, SMSCs also provide for a "Forward and Forget" or "Transaction Mode"
391 option where transmission is tried only once, returning proof of delivery as part of the process. These
392 existing protocol methods allow the status of message delivery to the recipient to be presented to the
393 PSAP immediately (e.g., confirmation that the message has been delivered, determination that the
394 handset is not responsive or not reachable, or representation that there is a network error and of what
395 type). With this knowledge, the telecommunicator can decide to take further action; for example, to
396 resend the same message or to attempt to reach the subscriber by voice calling, or to dispatch
397 emergency services based on the information already gathered by the PSAP.

398 **SMS via 10-digit long code**

399 The experience of using SMS via a 10-digit long code is what most of the US population is used to today,
400 where a mobile subscriber sends a message (or a series of messages) to a 10 digit number (e.g. 555-555-
401 1212). This is commonly referred to as 'text messaging' or 'texting'. Billions of SMS messages via 10
402 digit long codes are sent monthly in the United States.

403 It is generally believed that SMS to E9-1-1 utilizing a 10-digit long code would not be feasible for a
404 nationwide deployment. Some examples of potential deficiencies of this method are:

- 405 • 10-digits used for a regional SMS to E9-1-1 deployment strategy would need to be memorized
406 and/or programmed into handsets (e.g. Time consuming and difficult for the vast majority of the
407 population to configure correctly).
- 408 • Subscribers traveling outside of their normal coverage area would be expected to know the local
409 10-digit SMS to E9-1-1 sequence.
- 410 • The dynamic input of 10 digits into a device in order to contact the PSAP would be too costly in
411 time and risk to the sender for large scale acceptance.

³⁸ <http://apps.fcc.gov/ecfs/document/view?id=7021750484>

- "The CU Team's study tracked several hundred messages and found that all of the text messages sent were received by the cellular network, resulting in a "data loss rate" of 0% and a reliability level of 100%."
 - Univ of CO research
- "Other researchers have tested the reliability of Short Message Service (SMS) texts and found that the "data loss rate" over several thousand messages was less than 1%, resulting in a reliability level of 99 %. The statistical implication is that large samples might experience a small percentage of data loss, but overall the reliability for text messages is similar to that of voice calls."
 - CO Cited: Chwan-Lu Tseng, Joe-Air Jiang, Ren-Guey Lee, Fu-Ming Lu, Cheng-Shiou Ouyang, Yih-Shaing Chen, Chih-Hsiang Chang, "Feasibility study on application of GSM-SMS technology to field data acquisition", Computers and Electronics in Agriculture, Volume 53, Issue 1, August 2006, Pages 45-59, ISSN 0168-1699, 10.1016/j.compag.2006.03.005.
<http://www.sciencedirect.com/science/article/pii/S0168169906000494>

412 A possible method would be for a nationwide 10-digit (or shorter) number which is geo-targeted to the
413 correct PSAP via carrier methods as discussed below.

414 **Text to TTY**

415 Conventional Tele-typewriters (TTY) have been used for many years by the hard of hearing or speech-
416 impaired to communicate with one another and with PSAPs using a common protocol (code) referred to
417 as Baudot. PSAPs are mandated by the federal government to provide 9-1-1 access via TTY for the
418 hearing and speech impaired. However, legacy TTY technology has become antiquated with the
419 inception and increase in popularity of wireless devices and VoIP. Many of the consumers who
420 previously relied heavily on TTY communication now rely on other methods such as SMS. While there
421 are many PSAPs that are willing to discuss how to implement more modern forms of text to 9-1-1
422 solutions, there is very little funding available to upgrade their systems to do so. Since TTY technology is
423 already present at the PSAP, consideration has been given to converting incoming text, such as SMS to
424 Baudot as an interim text solution. There are known Quality of Service (QoS) issues with Baudot that
425 make any type of conversion to this technology less than desirable. Absent significant funding however,
426 during challenging economic times, text to TTY will remain a consideration for PSAPs that have no other
427 means of receiving text calls to 9-1-1.

428 **SMS via 4, 5, or 6-digit short codes**

429 Short codes are special telephone numbers, significantly shorter than full telephone numbers, which
430 can be used to address SMS messages from mobile phones which are sent to an application at the
431 carrier for interpretation of the intended purpose and/or recipient. Short codes are designed to be
432 easier to remember than normal telephone numbers (e.g. HELP = 4357, INFO = 4646, MAIL = 6245).
433 Carriers often have agreements in place for 'Common Short Codes' which would allow a single code to
434 be used in an SMS to E9-1-1 application across all carrier networks.

435 It is understood that SMS via a short code for E9-1-1 access would have more general acceptance by the
436 public than 10 digit short codes (See above). In addition, the technology, procedures and infrastructure
437 to facilitate the use of short codes are already in place in the United States.

438 Short code SMS messages are delivered via the SMPP protocol. The 4, 5, or 6-digit short codes
439 allow the sender of a message to appear as the same "from" number across multiple carriers. They
440 also enable a sender to utilize a single short code (e.g. 12345) to deliver an MO message to the
441 desired recipient regardless of their wireless carrier. Common short codes (CSC), these short strings
442 of numbers, are administered by a single CSC Administrator (CSCA) - the Cellular
443 Telecommunications & Internet Association (CTIA) - for a group of U.S. wireless carriers. In
444 addition, the CSCA oversees the technical and operational aspects of CSC functions and maintains a
445 single database of available, reserved and registered CSC.

446 Using a mobile device, users can send a Mobile Originated (MO) message to a short code via SMS.
447 Typically, the carrier utilizes the CSC database to determine where to forward the message. Often,
448 these messages are routed through an aggregator that manages interfaces to a number of application
449 providers. These aggregators fill the role of shielding the carriers from a large number of application
450 providers.

451 For emergency service use, there are a few different options for short codes. The primary challenge is
452 delivering the message to the correct 9-1-1 answering point, since the messages are not routed from the
453 originating device on the 9-1-1 network. Once the message is delivered from the carrier to the “owner”
454 of the short code, the message must somehow be delivered to the correct PSAP based on the caller’s
455 location. Several options have been implemented:

- 456 1) Designate a specific 5-digit short code for a region. Any text to that short code is routed directly
457 to a specific PSAP, regardless of the caller’s actual location.
- 458 2) Utilize keywords at the beginning of the text message. For example, New York City residents
459 might send a text message with the prefix NYC. The SMS message is delivered to the owner of
460 the short code who then recognizes the keyword and pushes the message to the correct PSAP.
- 461 3) Utilize an intermediary step. In this model an automated request for the caller to specify their
462 location is triggered (e.g. “please type in your exact address”), or a human intermediary who
463 interrogates to determine the location and routes the message to the correct PSAP.

464 A possible method of delivery currently under development is to deliver the text to a PSAP by
465 commercial location based services versus the current E9-1-1 location based routing.

466 Once the call has been delivered to a PSAP, there must be a mechanism for answering and responding
467 to the call, since the call is not delivered directly into the 9-1-1 network. Most solutions utilize a
468 dedicated “web page” and workstation for the telecommunicator to communicate with the caller. Some
469 sort of audible and visual alarm indicates a text call has arrived at the dedicated station. The
470 telecommunicator then interacts with the caller via a 2-way SMS session routed through the application
471 vendor. Other options include delivering the SMS text via baudot tones to existing TTY machines.

472 It should be noted that the integration of public networks such as the internet into secure ESInet
473 applications does bring a certain level of risk to an otherwise secure local area network (LAN). [See page
474 20 – Text Messaging Vulnerability]

475 **SMS to 9-1-1**

476 SMS direct to 9-1-1 (i.e. 3-digit short code) is perceived to be very similar to the 4, 5 and 6-digit short
477 codes as described above, and of course is generally believed to be the most effective method of SMS
478 communication for the general public.

479 **SMS Location determination**

480 The SMSC platform currently supported by wireless carriers could be used to route SMS direct to PSAPs.
481 SMS location determination may require additional integration at the carrier level in order to be
482 consistent with existing methodologies used for 9-1-1 today (e.g. WPHI or WRLS, WPH2) to route calls
483 to the correct PSAP. While 9-1-1 WPHII location determination would be complementary to a
484 nationwide offering, this would require a separate discussion that is outside of the scope of this
485 document.

486 **Text to 9-1-1 via Third Party Relay Service**

487 While the concept of a relay service is familiar to a PSAP through VRS, a TTY/TDD relay service, or
488 language translation service, it may not be the most effective solution. A Text Relay Service requires the
489 caller to contact a third party service to enable a conversation. The third party service must then
490 determine the appropriate PSAP and, when connected, relay all information to and from the
491 telecommunicator. The relay will most likely occur via a voice connection with the relay service and the

492 PSAP. Once a third party is introduced into the conversation, an inherent delay will exist and any delay
493 in providing emergency services is unacceptable.

494 **RTT**

495 Real-Time Text (RTT) is conversational text that is sent and received on a character by character basis.
496 The characters are sent immediately (in a fraction of a second) once typed and also displayed
497 immediately to the receiving person(s).³⁹ Unlike other forms of text messaging that are asynchronous,
498 RTT can be used in a bi-directional mode similar to voice conversations.

499 At the core of this framework are SIP control and Real-Time Text transport using Real-time Transport
500 Protocol (RTP) as described in RFC4103. SIP messages initiate sessions and manage the connection and
501 registry between communication end points. RTT is usually transported via the same protocol as VoIP
502 and Video-over-IP. As an IP-based means of communication, RTT requires the accessing device to have
503 access to an IP network (or simply, a data connection). RTT applications can be natively built into the
504 mobile device operating system, or operate as Over-the-Top applications loaded onto the device by the
505 user.

506 **Status of Interim Options**

507 **Text to TTY**

508 Currently, the ability to conduct a text conversation in the TTY environment exists once a wireless device
509 is enabled for TTY functionality and if the receiving party has TTY capability or a TTY device. The TTY
510 functionality for a wireless device may either be an option setting or may require hardware attached to
511 the device via the standard 2.5mm headset jack. However, initiating a standard text conversation to or
512 from a TTY device is not currently supported.

513 Interestingly, the FCC has received proposals from two separate vendors to provide text to TTY that may
514 be used until further network and technological architecture allow more robust solutions.

515 The first solution is to convert the SMS into a TTY message and delivers to the PSAP via a gateway.
516 Further, the proposal indicates WPH2 location information can also be provided to the PSAP.
517 Essentially, the PSAP will receive the SMS in the same manner as a TTY call, including the Baudot tones
518 associated. The system would also use the existing VoIP Positioning Center (VPC) and Emergency
519 Services Gateway (ESGW) used by VoIP carriers.⁴⁰

520 The second solution is similar in nature, using a secondary gateway to deliver the SMS to TTY call to the
521 PSAP. However, this solution requires the PSAP have IP-enabled workstations, an API for integration
522 with the CPE vendor, in addition to TTY/TDD equipment. This solution would also provide for WPH2
523 location delivery.⁴¹

³⁹ See the website for the Real Time Text Task Force (R3TF) at <http://www.realtimetext.org/index.php?pagina=27>

⁴⁰ See *In the Matter of Facilitating the Deployment of Text-to-9-1-1 and Other Next Generation 911 Applications*, PS Docket No. 11-153 and *Framework for Next Generation 911 Deployment*, PS Docket No. 10-255: COMMENTS OF NEUSTAR, INC., available at <http://apps.fcc.gov/ecfs/document/view.action?id=7021750472>

⁴¹ <http://apps.fcc.gov/ecfs/document/view;jsessionid=TMbyPhpTdTb2C8CnMLjQFSJD338sd4BF3TJr1dGZ4yvTMvvyC5k4!-321460796!1471562840?id=7021899251>. See *Letter to Marlene Dortch, Secretary, Federal*

524 Both proposed interim solutions provide for direct delivery of a call via a 9-1-1 trunk. These solutions
525 may be more cost effective for the PSAP, as each uses the ubiquitous TDD/TTY equipment already
526 present in almost all (if not all) PSAPs. This methodology requires, however, that the telecommunicator
527 remain on that call for the duration of the incident, as TDD/TTY calls should not be placed on hold. The
528 extended length of an SMS emergency call could have a significant operational impact on centers with a
529 small number of telecommunicators or 9-1-1 trunks.

530 **SMS via 4, 5, or 6-digit short codes**

531 **Benefits**

- 532 • Allows anyone to send a message to anywhere on any phone.
- 533 • Utilizes an interface familiar to most populations.
- 534 • SMS as a communication vehicle has shown to be effective in network overload situations.

535 **Disadvantages**

- 536 • Depending on the implementation, may require different numbers to be remembered in
537 different regions, potentially confusing callers.
- 538 • Not real time. Delivery times can vary widely from seconds to minutes (although clearly minutes
539 are normally an extreme case). European experience shows that the average call taking time for
540 a SMS-based emergency call is 11 minutes.
- 541 • Messages are asynchronous and can be delivered out of order, potentially confusing the
542 telecommunicator or caller.
- 543 • Often requires messages to go through numerous aggregators and third parties, raising
544 questions on audit trails.
- 545 • No guaranteed message delivery or feedback mechanism for lost Mobile Originated (MO)
546 messages.
- 547 • Varying abilities to locate the caller depending on the implementation.

548 **Example Deployments**

549 In most instances currently deployed, short code is used for anonymous crime reporting through a third-
550 party program that removes identifying information. There are numerous examples of this format in
551 use today in both large and small metropolitan areas. The anonymity afforded the users promotes the
552 use of such methodology for receiving information on incidents that may otherwise go unreported.

553 **Operational Learnings**

554 The same potential drawbacks to using SMS are also present under these circumstances: no location
555 information; timeliness of information; additional equipment or programs required; character
556 limitations that may present issues with understanding for lengthy, out of order, messages, etc.

557 **SMS to 9-1-1**

558 **Benefits**

Communications Commission, from H. Russell Frisby, Jr., Stinson Morris Hecker LLP, Counsel for TeleCommunication Systems, Inc., Re: Notice of Ex Parte Meeting – 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 □ March 8, 2012

- 559 • Direct receipt of messages without a relay service.
- 560 • An avenue of communication available to all with a cellular telephone.
- 561 • SMS as a communication protocol has shown to be effective in network overload scenarios.

562 **Disadvantages**

- 563 • Only Phase I enabled at this time.
- 564 • Currently, no mechanism in place to provide for an indication that the response from the
565 telecommunicator was received by the caller.
- 566 • Only an indication to the caller provided when the system is unavailable, not if the message was
567 undeliverable – the call could remain in “limbo” without the caller being aware.
- 568 • Depending on the implementation, may require hardware changes at the PSAP to facilitate call
569 handling.
- 570 • Requires changes to carrier infrastructure.
- 571 • Not real time. Delivery times can vary widely from seconds to minutes (although clearly minutes
572 are normally an extreme case). European experience shows that the average call taking time for
573 a SMS-based emergency call is 11 minutes.
- 574 • Messages are asynchronous and can be delivered out of order, potentially confusing the
575 telecommunicator or caller.

576 **Example Deployments**

577 The Durham Emergency Communications Center, out of Durham, North Carolina, is in the process of a
578 trial via a cooperative effort with several vendors. At the time of this writing, they have only received a
579 single SMS to 9-1-1 call since starting this project in August 2010. This is not due to lack of
580 advertisement having used a wide range of media to deliver the message to the community: Twitter,
581 Facebook, list serve accounts, and other media sources. Further, this is less than expected in an area
582 which includes Duke University and North Carolina Central University.

583 In order to facilitate the delivery of SMS to 9-1-1, the wireless carrier is passing all text messages
584 through third-party gateway, which, in turn, then filters the SMS to 9-1-1 calls for delivery to the PSAP.
585 The text is not delivered via the ACD system in place but comes into a separate queue button on the
586 telecommunicator’s screen. The “call” rings at all stations and the available telecommunicator answers
587 to initiate the process. The messaging is then handled via the TTY module incorporated into the CTI
588 system. This methodology allows for pre-scripted messages to speed the receipt of pertinent
589 information. Additionally, a telecommunicator is able to handle multiple text messages as well as phone
590 calls aiding productivity.

591 All text messages are printed for record keeping purposes. The reporting system accompanying the CTI
592 shows the answer time of the telecommunicator and the time of messages sent or received, but does
593 not capture the time of the originating message. However, according to James Soukup, Director of the
594 DECC, they have not been experiencing any delays in delivery during the twice-daily testing done by
595 personnel.

596 **Operational Learnings**

597 Perhaps the greatest operational lesson in the Durham Emergency Communications Center is that we
598 may not be overwhelmed with SMS to 9-1-1 calls.

599 **Text to 9-1-1 via Third Party Relay Service**

600 **RTT**

601 **Benefits**

602 RTT provides a number of key operational communication benefits:

- 603 • Provides real-time feedback – both the telecommunicator and caller can see that the other
- 604 side has received and is responding to their message.
- 605 • There are a number of encryption options, ensuring message traffic is secure.
- 606 • There is no limit to the length of a message (SMS is limited to 160 characters).
- 607 • No message delay.
- 608 • Broad support for Video and picture messaging.

609 **Disadvantages**

- 610 • RTT requires a data connection. Currently these connections do not receive priority on the
- 611 carrier communication networks. The coverage and effect of data connection loss is to be
- 612 determined.
- 613 • Is not currently available natively on carrier devices or used in other common forms of
- 614 communication. This means that users would have to install a separate application for
- 615 emergency communication that may not be as familiar as other means of communication they
- 616 use more frequently.
- 617 • Depending on the implementation, may require hardware changes at the PSAPs.
- 618 • Depending on the implementation, may require a phased roll out with different levels of service
- 619 available in different geographic regions at different times.

620

621 **Example deployments**

622 Early testing is being done in Spain, but the results of this deployed are not known. There are currently

623 no announced deployments in the United States.

624 **Operational Learnings**

625 N/A

626 **Europe's REACH112 project**

627

628 In addition to the current efforts in the United States, Europe has also been introducing the concept of

629 texting to 112, the European emergency services number. The on going efforts in Europe have seen

630 more instances of implementation than the U.S. and their processes and information are thereby useful

631 for our purposes.

632 **Example Deployments**

633 Iceland, which operates a single PSAP for the country, has been receiving SMS messages to 112 since
634 April 2006. As with other efforts, the intention is to address the needs of the Hearing Impaired
635 community but has seen usage from others during some emergent situations. As with a normal
636 TTY/TDD conversation, Iceland has developed predetermined responses for SMS messages in an effort
637 to facilitate the communication process. Further, they encourage the deaf and hearing impaired that
638 have an underlying medical condition to have prepared emergency SMS messages available for use.

639 Just as with a standard voice initiated call, all SMS messages receive a response from a
640 telecommunicator. Since location information is not available via SMS, they are often required to
641 contact the caller and request the caller telephone 112 directly. For 2008, it is estimated they received
642 an average of 124 SMS messages a month. By general observation, Iceland has determined that
643 approximately 3% of the total messages are truly emergency SMS contacts. However, even one that
644 may provide valuable assistance is worth the time.

645 In Sweden, the implementation included RTT in addition to a video component called Total Conversation
646 and is routed through two specific PSAPs. If the call is for another PSAP, the call is handled by the two
647 PSAPs and the information is passed to the destination PSAP. Again, this system is mostly focused on
648 the hearing and speech impaired community rather than a wholesale deployment. Each time a message
649 is initiated, the caller is automatically connected to a relay service and a telecommunicator at the same
650 time. Not only are the three parties connected for the text communication, the connection also
651 includes a video component allowing the telecommunicator to assess the situation visually. This
652 methodology requires extra hardware and an IP connection to the 112 facility, requiring additional time
653 and resources to deploy.

654 **Operational Learnings**

655 One of the more common threads learned with SMS implementation is the additional length of time
656 associated with processing a text. In an industry measuring seconds, 13 minutes is a lifetime.

657 **Text Messaging Vulnerability**

658

659 Any discussion regarding sending a text message into a PSAP must also consider potential security or
660 veracity concerns. “Spoofing” is already a concern for consumers in regards to email messages but it
661 also affects text messages in that a well-versed person may spoof the caller ID from whom the message
662 was sent. Fortunately, for a standard voice call into a PSAP via analog lines, the caller information takes
663 a different path and instances of ANI spoofing are non-existent. However, as PSAPs migrate to an IP-
664 based infrastructure to allow for the messaging, the vulnerability to spoofing and other potentially
665 malicious messages increase.

666 To help combat, or at least increase enforcement capabilities, the Truth in Caller ID Act was signed into
667 law in 2010 expressly to prohibit “spoofing” of caller ID for malicious intent or to defraud. In the FCC’s
668 paper on Caller Identification Information in Successor or Replacement Technologies, June 22, 2011,

669 issues concerning the vulnerability to spoofing that may occur, even in a PSAP, were further identified.⁴²
670 Furthermore, the 2010 white paper produced by the 4G Americas called *Texting to 9-1-1: Examining the*
671 *Design and Limitations of SMS*, also raises concerns about vulnerabilities.⁴³

672 There are many third-party services that are available to the public that offer the ability to change the
673 originating number of an SMS. Such services do make users aware of the potential legal ramifications of
674 their offering but generally do not monitor that activity of the user. This can be done either via a mobile
675 device or through a home computer. Potentially, a message can even be generated via a provider's
676 website that allows messaging and does not verify the user's input before sending.

677 One possible scenario is that an individual could generate a message to a PSAP that requires a large-
678 scale response, such as a Special Weapons And Tactics (SWAT) unit. Not only would this potentially tie
679 up valuable resources, it could endanger otherwise innocent parties.

680 An additional consideration for messaging may be addressing. When RTT becomes a reality on a broad
681 scale, a user may send a message to 9-1-1 and other persons at the same time. If one of those other
682 parties is not within the same area as the sender and replies to "All", it may generate an additional
683 message to another PSAP but not the original PSAP. Instead of a single PSAP responding to an incident,
684 a second PSAP may inadvertently become involved.

685 The worst-case scenario for any implementation of messaging into a PSAP in an IP-based infrastructure
686 would be the introduction of a virus into the network.

687 **Human and Operational Aspects of NG 9-1-1**

688

689 While other sections of this white paper have addressed the pressing technological issues of Next
690 Generation 9-1-1, no review of the subject would be complete without an assessment of the human and
691 operational impact of the impending migration. The rapid progress of change during recent decades has
692 presented PSAPs with a variety of challenges such as enhanced wireless 9-1-1 and Voice over Internet
693 Protocol (VoIP.). However, none of these marks such a complete revision of the way we do business as
694 the advent of true Next Generation 9-1-1 services.

695 A measurable portion of the current human challenge is to truly understand what NG is and what it
696 takes to get there. Hopefully this document will shed some light on these issues; however, many
697 telecommunicators – and even administrators – wrestle with grasping the concept as a whole. As such,
698 there is misunderstanding, stress, and fear over what is the real cost (both in cash and impact upon

⁴² See *Federal Communications Commission, Caller Identification Information in Successor or Replacement Technologies, DA 11-108*, (filed June 22, 2011), available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-11-1089A1.pdf

⁴³ See *Texting to 9-1-1: Examining the Design and Limitations of SMS* (dated October 2010), by 4G Americas, available at <http://www.4gamericas.org/documents/SMS%20to%20911%20White%20Paper%20Final%20October%202010.pdf>

699 operations) and the timeline for implementation.⁴⁴ At this writing, the committee is unaware of any
700 100% Next Generation Compliant PSAPs in the United States, nor is there a firm and codified “drop dead
701 date” by which agencies must comply with providing all of the services associated with NG 9-1-1. Those
702 facilities currently providing text to 9-1-1, for example, do not all share a common methodology, nor is
703 there sufficient data available from these trials on which to accurately make projections nationwide. For
704 example, Durham, NC, reports an extremely low usage of their 9-1-1 text service. While this trial is
705 limited to a single carrier, this carrier has a significant market share and the region is known for both
706 high-tech industry as well as several major universities. Given the latter, one might expect a higher than
707 average usage, yet the experience speaks otherwise.⁴⁵

708 Despite the lack of data concerning prospective volume, there are some relatively reliable assumptions
709 that can be made based upon other experience and knowledge. Included here are:

- 710 • A text conversation will take longer to process than a voice conversation regarding the same
711 amount of information.
- 712 • The ability to actively interact with the caller is of benefit to the telecommunicator.
- 713 • Unlike TTY/TDD usage, there is currently no “official” guide to abbreviations used in texting.
714 Misinterpretation of abbreviations could lead to longer processing times and/or errors.
- 715 • Background noises, tone of voice, and other audio clues are often used by telecommunicators
716 to gain additional knowledge regarding emergency calls. These will be absent in text calls, just
717 as they are now in TDD/TTY.⁴⁶
- 718 • Processes to adequately deal with protocol driven interrogation will have to be adapted for use
719 with Next Generation 9-1-1, as will policies for dealing with non-English speaking callers.
- 720 • Human friendly interfaces between the systems that receive Next Generation “calls” will need
721 to be developed. While this may more properly fall under the realm of technology, these
722 interfaces must be intuitive, and to the degree possible seamless, in order to be easily
723 understood and used by telecommunicators. As the number and type of devices used to
724 contact 9-1-1 increases, these interfaces must keep pace with the demand.⁴⁷
- 725 • The impact of clusters of Next Generation calls upon PSAPs must also be understood. We have
726 seen the results of this phenomenon with regards to wireless telephony. How will this play out
727 in the NG world?
- 728 • Both telecommunicator training and internal policy must reflect the ever changing world of
729 Next Generation.⁴⁸
- 730

⁴⁴ See *Report on Next Generation 9-1-1 in California Public Meetings by California Technology Agency Public Safety Communications Office* (dated July 2011, Version 1.0), available at http://www.cio.ca.gov/Government/Publications/pdf/Report_on_NG9-1-1_in_CA_Public_Meetings_Rev_1_0.pdf

⁴⁵ Soukup, James Director, Durham Emergency Communications Center, Durham, NC. Telephonic interview with committee members, 21 March 2012.

⁴⁶ See *911 texting idea has local support*, by Sam Shawver, *The Marietta Times*, (dated February 6, 2012), available at <http://www.mariettatimes.com/page/content.detail/id/542133.html>

⁴⁷ See *Next Generation 9-1-1 (NG9-1-1) System Initiative: Human Machine Interface Display Design Document by Intelligent Transportation Systems, U.S. Department of Transportation* (dated January 2008, Version 1.0), available at http://www.its.dot.gov/ng911/pdf/NG911_HMI_Display_Design_FINAL_v1.0.pdf

⁴⁸ See *Next Generation 9-1-1 (NG9-1-1) System Initiative: NG9-1-1 Transition Issues Report by Intelligent Transportation Systems, U.S. Department of Transportation* (dated February 2008, Version 1.0), available at http://www.its.dot.gov/ng911/pdf/NG911_TransitionIssuesReport_FINAL_v1.0.pdf

731 From a management point of view, administrators must find a way to acquire Next Generation
732 technology and integrate it into daily operations. This is easier said than done. A myriad of legal,
733 financial, and technical hurdles may often have to be crossed in order for this implementation to take
734 place.

735 As part and parcel of this acquisition, training, quality assurance, and policy development must also
736 occur. Public education will also become increasingly important, as it is likely that the nationwide
737 implementation of Next Generation will not occur overnight. During the transition period agencies not
738 having NG functionality will need to assure that their citizens understand this fact. As announcements of
739 the implementation of Next Generation in other areas increase, this understanding becomes even more
740 critical as the presence of these features may often be assumed through inference.

741 Management policies will also be needed for the retention, release, and legal presentation of Next
742 Generation records. While some of this policy will need to be developed on the state level, PSAPs will
743 still need to deal with these issues on the local level.

744 Finally, stress and liability rate high among the human concerns that must be addressed. While there is
745 often discussion surrounding equal protection from liability for providers of 9-1-1 services, thought must
746 also be given to liability incurred by the public sector as well. Do protections that may exist now remain?
747 What legal pitfalls exist, if any, in these uncharted waters? Is new legislation required to address these
748 and other issues associated to NG 9-1-1?⁴⁹

749 The impact of stress upon telecommunicators has long been documented. However, the impact of Next
750 Generation on stress still remains to be seen. Will the assumed increase in processing times create call
751 backups in the 9-1-1 center, leading to frustration, pressure and hurried calls? Will the lack of human
752 contact associated with text messaging play a role? And while the scope of this white paper relates
753 solely to text messaging, will future generations of technology that import real time videos of horrific
754 crime, fire, and accident scenes directly into the PSAP place a different type of stress on those charged
755 with handling these calls? Regardless of the answers, the public safety telecommunications community
756 must be ready to address these challenges.⁵⁰

757 **Summary of Operational Learnings**

758

759 The road ahead still has issues that need to be addressed, issues that will not be resolved over night.
760 However, the course is set and the functionality will be implemented in one form or another. With all of
761 the available options, one may rise to the top as the most effective or the best result may be a
762 combination of multiple solutions. Each of the solutions discussed has positives and negatives as no one
763 solution can currently meet the needs and expectations of a PSAP. Whatever that solution becomes, we
764 must ensure that we are prepared both technologically and personally.

765 Some of the deployment options have a limited scope and others have yet to be implemented. Efforts
766 are continuing to refine the various solutions and make them effective for a PSAP. Will PSAPs be
767 overwhelmed with messages? Based on the DECC project, possibly not. However, it is but one instance
768 of many to come and, as public awareness grows, including the hearing and speech impaired
769 communities, messages may become more prevalent. The time needed to process a message in the

⁴⁹ Ibid.

⁵⁰ <http://911wellness.com/2012/02/21/frontline-dispatchers-voice-concern-re-ng911/>

770 currently available forms will remain an issue for PSAPs. Telecommunicators pride themselves on being
771 efficient and timely when processing calls, the addition of messaging will cause frustration by not being
772 able to quickly obtain information.

773 Effective training of telecommunicators will be the key to a successful implementation of a solution.
774 Administrators and training personnel must become versed in a methodology with which they may not
775 be comfortable.

776 Security of any messaging system, whether from spoofing or viruses, will remain a concern. The public
777 needs to be secure in the knowledge that their ability to communicate during a crisis situation is
778 available at all times. Perhaps authentication processes can be developed to limit the impact of
779 spoofing. Perhaps an increased or multi-level virus protection can be implemented at the provider level
780 in addition to the PSAP level.

781 Through cooperative efforts of telecomm providers, both for emergency communication and for
782 consumer communication, a solution can be achieved else this discussion would be pointless. For
783 emergency communication the solution must be able to work with and around other operations. Simply
784 forcing a solution just to have one is not effective and will most likely cause issues for
785 telecommunicators and impact effective response. A telecommunicator must be able to grasp the
786 concepts and limitations of the solution and use it to advantage. Consumer telecomm providers must
787 also be aware of the limitations of the solution in addition to the budgetary limitations that impact a
788 PSAP.

789 On February 9, 2012, the CTIA responded to the FCCs NPRM on Text-to-9-1-1, and outlined these same
790 arguments in addition to questioning the authority of the FCC to govern messaging. Essentially, since
791 the FCC admitted in its own document that SMS was considered an informational resource and not an
792 interconnected service which potentially limits its ability to regulate SMS.⁵¹ Clearly the CTIA is poised to
793 combat what may be perceived as the FCC overstepping their authority and ruling prematurely on a
794 technology that may not be quite ready to provide a viable solution. If the FCC does rule regardless of
795 protest, the impending litigation and opposition may further delay the ability of a PSAP to receive any
796 text-to-9-1-1 solution. Further, APCO also responded to the FCCs NPRM reinforcing the idea that the
797 FCC should focus on a long-term solution versus mandating any short-term and, potentially harmful
798 solution.⁵²

799

800

⁵¹ See *In the Matter of Facilitating the Deployment of Text-to-9-1-1 and Other Next Generation 911 Applications*, PS Docket No. 11-153 and Framework for Next Generation 911 Deployment, PS Docket No. 10-255: REPLY COMMENTS OF CTIA – THE WIRELESS ASSOCIATION (dated February 9, 2012), available at <http://apps.fcc.gov/ecfs/document/view?id=7021859396>

⁵² See *In the Matter of Facilitating the Deployment of Text-to-9-1-1 and Other Next Generation 911 Applications*, PS Docket No. 11-153 and Framework for Next Generation 911 Deployment, PS Docket No. 10-255: COMMENTS OF APCO INTERNATIONAL (dated December 12, 2011), available at http://www.apco911.org/about-apco/annual-reports/doc_download/158-apco-comments-to-fcc-nprm-on-text-to-9-1-1.html