Wireless Carriers and Text Messaging Providers Should Check PSAP Registry for Text-to-911 Readiness and Contact PSAPs

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Yesterday, the Federal Communications Commission ("FCC" or the "Commission") released its final public notice of updates to the Commission's Public Safety Answering Point (PSAP) Text-to-911 Readiness and Certification Registry (Text-to-911 Registry). The Text-to-911 Registry contains the effective readiness date of the PSAPS to receive texts to 911, as well as point of contact information for providers to use to contact PSAPs for coordination purposes.

As stipulated in the FCC's Text-to-911 Order from August 2014, Commercial Mobile Radio Service (CMRS) providers and other providers of interconnected text message service (collectively, "covered text providers") must begin routing 911 text messages to requesting PSAPS within six months of notification that the PSAP is ready. The notice can come directly from a PSAP or by listing the PSAP on the Text-to-911 Registry posted on the FCC's website.

Pursuant to rules adopted in the FCC's August 2014 Text-to-911 Order, CMRS providers and other providers of interconnected text messaging applications (those that allow consumers to exchange texts with all or substantially all text-capable U.S. telephone numbers) were required to be text-to-911 capable by the end of 2014. Covered text providers have until June 30, 2015 or six months from the date of a PSAP request, whichever is later, to implement text-to-911 for that PSAP.

A PSAP's written notification to a covered text provider triggers the obligation to implement text-to-911 for that PSAP within six months. In addition, a PSAP's registration with the FCC's Text-to-911 Registry triggers the obligation for covered text providers to begin routing emergency texts to that PSAP where applicable within six months. Many PSAPs registered before the end of 2014 and therefore the deadline was June 30, 3015. In the notice, the FCC said that the Public Safety and Homeland Security Bureau (the "Bureau") will no longer announce updates to the Text-to-911 Registry, but will update the online registry on a regular basis.

Going forward the expectation is for providers to regularly check for updates to the Text-to-911 Registry to review the text-readiness of PSAPs in their service areas and to coordinate

implementation of text-to-911 service with them. The Text-to-911 Order created a requirement for covered text providers to determine the capability of PSAPs in their service areas to receive emergency texts, saying that "[c]overed text providers should periodically review the text-readiness of PSAPs in their service areas and reach out to these PSAPs as necessary to coordinate implementation of text-to-911 service."

Matthew Weinmann, a legal assistant, contributed to this post.