

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendments to Part 4 of the Commission’s	)	
Rules Concerning Disruptions to	)	PS Docket No. 15-80
Communications	)	
	)	
Improving 911 Reliability	)	PS Docket No. 13-75
	)	
Ensuring the Reliability and Resiliency of	)	PS Docket No. 23-5
the 988 Suicide & Crisis Lifeline	)	
	)	
New Part 4 of Commission’s Rules Concerning	)	ET Docket 04-35
Disruptions to Communications	)	
	)	
Implementation of the National Suicide	)	WC Docket No. 18-336
Hotline Act of 2018	)	

SUPPLEMENTAL COMMENTS OF FAILSAFE COMMUNICATIONS INC.

FailSafe Communications Inc. respectfully submits this supplemental information following the September 25, 2026 Public Notice issued by the Commission's Public Safety and Homeland Security Bureau concerning 911 and 988 outage notification obligations.¹

This Public Notice comes at an appropriate time. While the Commission has devoted significant resources to the prevention, detection and reporting of 911 outages, they continue. For example, the day before the Notice was issued, Oklahoma had an outage that disrupted operations at 73 out of 122 call centers.² Lance Terry, Oklahoma's 911 Coordinator, reported that the cause was a failure in an AT&T switch.³ A few days earlier, Atlanta had a “technical issue” that knocked 911 systems out for several

1 Public Notice, “Communications Providers Must Comply With 911 and 988 Outage Notification Obligations,” PS Docket Nos. 15-80, 13-75, ET Docket No. 04-35; WC Docket No. 18-366, Released September 25, 2026. (“Public Notice”)

2 <https://www.aol.com/articles/disruption-911-call-centers-caused-230502000.html>

3 *Id.*

hours.⁴ One report said Atlanteans were “told they could go directly to a hospital, police precinct or fire station.”⁵ Thus, the need for Commission action continues. As Chairman Carr recently stated, “Calls to 911 **should always go through**. During times of crisis, Americans do not think about the complex web of networks and providers that make the call for help possible. They just expect that when they dial 911, someone will answer.”⁶

FailSafe agrees with the Bureau's emphasis on timely outage discovery and meaningful notification. The Public Notice states that providers must notify affected 911 and 988 special facilities as soon as possible, but no later than 30 minutes after discovering a qualifying outage. Importantly, the Bureau also emphasizes that providers have an obligation to take “**reasonable steps to discover outages**.”⁷

That distinction is important. Timely notification necessarily begins with timely discovery.

I. OUTAGE DISCOVERY IS AN ESSENTIAL PART OF 911 RELIABILITY

The Bureau correctly recognizes that an outage notification requirement has limited value if the underlying service impairment is not promptly discovered. This issue becomes particularly important when emergency calls fail somewhere in the originating telecommunications network before reaching a Public Safety Answering Point, Emergency Communications Center, or Next Generation 911 environment. In such circumstances, the 911 system itself may have no record that the caller attempted to reach emergency services.

As FailSafe has previously explained in this proceeding, sophisticated improvements within the NG911 environment do not necessarily provide visibility into emergency call attempts that fail before reaching that environment. The September 25 Public Notice appropriately focuses attention on this discovery problem. The Bureau states that providers are expected to design their systems to ensure prompt internal notification concerning events that could lead to an outage.⁸

4 <https://www.wsbradio.com/news/local/atlanta-911-services-fully-restored-after-hours-long-outage/QJYZOLDOLVGLDFVTGONKISPKNKQ/>

5 *Id.*

6 Statement of Brendan Carr, June 25, 2026. <https://docs.fcc.gov/public/attachments/FCC-26-39A2.pdf> (emphasis added)

7 Public Notice, Footnote 21 and accompanying text. (emphasis added)

8 *Id.*, Footnotes 21 – 23 and accompanying text.

The Bureau further emphasizes that outage notifications must provide useful information rather than simply announce the possibility that an outage exists. Among other things, providers are expected to identify the geographic area affected and explain how the outage potentially affects 911 or 988 service.⁹

FailSafe agrees.

A provider cannot provide actionable information about a 911 failure it has not discovered.

II. IMPROVED DISCOVERY NEED NOT REQUIRE REPLACEMENT OF EXISTING 911 INFRASTRUCTURE

FailSafe respectfully submits that improved outage discovery does not necessarily require replacement or substantial modification of existing 911 or NG911 infrastructure. Information useful in discovering telecommunications failures already exists within intelligent signaling networks operated by communications service providers. A 911 call attempt generates signaling information whether or not the associated voice call ultimately completes.

That information can be observed and interpreted to identify unsuccessful emergency call attempts and other conditions potentially indicative of service impairment. It can also assist in identifying the responsible communications provider, geographic concentrations of unsuccessful calls, and other information useful in assessing the nature and scope of an outage.

This is not merely a theoretical proposition.

FailSafe Communications has developed and patented T911™, which applies this methodology to unsuccessful 911 call attempts. FailSafe has demonstrated the capability to Commission personnel in Washington, D.C. The attached Compendium provides a nontechnical description of the technology and includes information permitting the capability to be observed through a live demonstration.

T911™ utilizes intelligent signaling network information that communications service providers already operate and understand. The same underlying information can support automatic alerts, improved trouble isolation, identification of relevant providers, and data driven regulatory notifications.

The point is not that the Commission should require any particular commercial product or technical implementation. Rather, the existence of such capabilities demonstrates that improved originating network visibility and outage discovery are technically achievable without requiring wholesale replacement of existing emergency communications infrastructure.

⁹ *Id.* Footnote 30 and accompanying text.

III. TECHNOLOGY NEUTRAL REQUIREMENTS CAN ENCOURAGE BETTER RESULTS

The Bureau's Public Notice also recognizes that providers may use third party vendors to conduct network monitoring, perform outage analysis, and send notifications to special facilities on the provider's behalf.¹⁰ Providers nevertheless remain responsible for compliance and should ensure that third party arrangements support timely and accurate identification of outage information.¹¹ FailSafe believes this technology neutral approach is appropriate.

The Commission need not prescribe the particular hardware, software, signaling information, analytics, vendor, or architecture that a provider must employ. Providers can instead remain free to select technologies appropriate to their networks while being responsible for achieving the public safety objective established by the Commission. That objective should include reasonable measures capable of discovering failures affecting emergency communications, including failures occurring before an emergency call reaches the 911 system itself.

The attached Compendium illustrates one existing implementation. It is provided not to request Commission endorsement of T911™ or any particular commercial solution, but to demonstrate that technology capable of providing additional visibility into unsuccessful 911 call attempts already exists.

The practical availability of such technology is relevant when evaluating assertions that improved outage discovery would necessarily impose substantial technical or infrastructure burdens.

¹⁰ *Id.*, Footnote 48 and accompanying text.

¹¹ *Id.*

CONCLUSION

FailSafe Communications agrees with the Bureau that meaningful 911 and 988 outage notification begins with meaningful outage discovery. The Commission's emphasis on reasonable steps to discover outages is therefore important. Emergency communications centers cannot respond to calls they never receive, and providers cannot provide timely and actionable information concerning failures they never detect.

Existing telecommunications signaling information can provide additional visibility into such failures. The attached example demonstrates one means by which that information can be used without replacing the underlying 911 or NG911 infrastructure.

FailSafe respectfully encourages the Commission to continue pursuing technology neutral requirements that establish the necessary public safety outcome while permitting communications providers and their technology partners to determine the most effective means of achieving it.

Respectfully submitted,

FAILSAFE COMMUNICATIONS INC.

Eddie M. Pope
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September 28, 2026

APPENDIX A

America's Invisible Emergency: The Hidden Crisis of 911 Calls That Never Reach Help

FailSafe Communications Inc.

AMERICA'S **INVISIBLE** EMERGENCY

THE HIDDEN CRISIS OF 911 CALLS
THAT NEVER REACH HELP

FailSafe
Communications Inc.

"Because Lives Are On The Line"™





*Five seconds earlier, life is ordinary.
Five seconds later... nothing else matters.*

What Happens When a 911 Call Does Not Get Through?

Every emergency begins with a single moment when an ordinary day becomes anything but ordinary. It can be when a mother cannot wake her baby, or when a husband watches his wife collapse without warning. It can be a driver who smells gasoline inside a crushed automobile. It may be a woman hiding in silence who hears footsteps outside her bedroom door.

Any life can have an ordinary day that is interrupted without warning. There is no announcement. No countdown. No soundtrack. One moment a family is eating dinner. The next, a child is choking. In the space between two heartbeats, ordinary life becomes an emergency.

Now imagine that today is your worst day. Not tomorrow or in the distant future. Right now. The room is suddenly too quiet because someone you love has stopped breathing. Your hands begin to shake. You reach for your phone.

Without thinking, you press three numbers. **9-1-1.**

...and your call does not go through.

You have four bars on your cell phone. The call appears to connect. Then...nothing. No dispatcher. No police. No ambulance. No fire engine. Sometimes 911 calls disappear. When that happens there is no indication at the 911 center that anyone tried to call.

*You are an **invisible caller**, and on your own.*

It happens all the time. Not hypothetically. Not in fiction. Today. In America.

We Make Invisible 911 Callers Visible

FailSafe Communications Inc. developed and patented T911,™ a system that makes invisible 911 callers visible. We demonstrated it before the Federal Communications Commission in Washington DC. Then something unexpected happened. We realized that the potential uses for our methodology are much broader than we thought.

We are going to need a bigger boat.

- A telephone company can now be more aware of what is happening in its own network, reduce regulatory exposure, fines, even create new sources of revenue.
- Government and elected officials can see better accountability during major calling outages, and another way to protect their constituents.
- Public-safety and 911 technology companies can uncover a missing capability that complements the products and services they already sell.
- An NG911 provider can gain visibility into events occurring before an emergency call ever reaches the sophisticated systems it provides.

As the Invisible Caller issue becomes more widely recognized by carriers, 911 agencies, governments, standards organizations and regulators, the question is no longer, "Who needs this?" It becomes, "Who *doesn't* need this?"



We Are Not a Competitor! Anyone Can License T911™

Most companies enter an established market in order to take business from somebody already there. FailSafe is different. We address a problem that exists outside of 911 systems, in the calling networks of phone companies. We do not compete with anyone.

Rather, T911™ is licensed, customized, and integrated into different applications, allowing any public-safety vendor or government contractor to continue doing what it does best, but with expanded capabilities.

Potential T911™ Markets:

FailSafe licenses at the intersection of:

- 91,000+ local governments
- 1,800+ telecom service providers
- 50+ federal/state regulatory bodies
- AI, 911, and DRaaS providers

A Rare New Revenue Opportunity

- Patent-protected methodology
- Low infrastructure overhead
- Licensable in multiple markets & applications
- Try it for yourself right now:



FailSafe is a Service Disabled Veteran-Owned Small Business

FailSafe's status as a Service-Disabled Veteran-Owned Small Business (SDVOSB) can potentially complement the resources of a larger company. Federal agencies and prime contractors operate in an environment in which small-business participation, including participation by disadvantaged businesses is important. This creates opportunities and relationships in which FailSafe contributes more than a patented methodology alone. For a large government contractor, partnering with us can combine a differentiated public safety technology with the contracting advantages of working with an SDVOSB.



Benefits to Communications Service Providers (CSPs)

There are some 1800 independent CSPs in the United States. If you are one of them, when was the last time your company had a chance at a new, high-margin, untapped market? You know better than anyone that the landscape is dominated increasingly by a small handful of large players. Not any more. Here is something you can do right now.

T911™ utilizes *Intelligent Signaling Networks* (ISNs) that CSPs already operate and understand. A 911 call attempt generates signaling information whether the voice call completes or not. By interpreting this data, the patented FailSafe methodology helps invisible callers. We can show you how to deploy T911™ in your service area, or in other areas, and train your sales team to offer this lucrative high margin service. Once you are licensed and using our methodology, there are other benefits as well, including:

Automatic Outage Reporting, Less Liability, Better Trouble Isolation

CSPs have been fined as much as \$22 million *each* by the FCC for botched 911 calls. Using the same ISN data, we can show you how to trigger alerts so you know about problems before they become critical, and help automate data driven regulatory notifications, improving reporting accuracy and reducing regulatory exposure.

Stop Chasing Outages for Other Providers Right Now

When an outage occurs it is not immediately apparent which carrier has the problem. This results in erroneous and duplicate outage reports to 911 centers and more work for you. There is a better way. The Intelligent Signaling Network carries carrier identification information. It benefits you. It benefits the 911 center.

(In a way this is kind of like the inventor's house where we raised seven children. Humor us here a little while we make the point)¹

¹ Adapted from Leo and Sharon Wrobel's forthcoming book, *America's Invisible Emergency: The Hidden Crisis of 911 Calls That Never Reach Help*, coming January 2027.



Summary and Next Steps

The Titanic was the most advanced passenger ship of its day. The Space Shuttle Challenger represented a pinnacle of American engineering. STS Columbia completed mission after mission before one small piece of foam revealed an unseen vulnerability. Complex systems rarely fail because they are primitive. They fail because something happens that their designers did not fully anticipate, appreciate or see. This includes Next Generation 911, and its missing capabilities regarding Invisible Callers.

NG911 represents an advancement in emergency communications. But even the most sophisticated 911 system cannot act upon calls that fail somewhere upstream and never complete. If the call never reaches the NG911 environment, the people and technology inside it never know the caller existed. FailSafe Communications exists because no one should ever be an Invisible Caller. If your organization carries 911 traffic, builds public safety systems, serves government, invests in critical infrastructure, or just wants to help us solve this problem, we should talk.

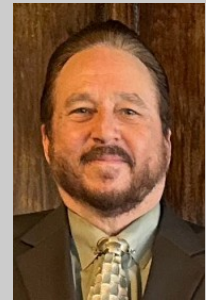
Every improvement in public safety has begun with someone recognizing a problem that others first accepted as inevitable. Smoke detectors, seat belts, heart defibrillators, ground-fault circuit interrupters and Next Generation 911 itself all began with the same simple observation: **We can do better.** Because the greatest danger to public safety today may be the emergency that we never knew happened.

For licensing, partnership, investment, or acquisition discussions, Email inventor@t911.ai

Founders and Principals

Leo A. Wrobel, T911™ Inventor and FailSafe Founder

Leo is an industry pioneer, and business continuity expert whose career has focused on opportunities that intersect technology, infrastructure, and regulation. In 1986, he built the first computer disaster recovery center located within a telephone central office. He later became the first in Texas to transport telephone traffic over a cable television network. He is the author of 12 books and more than 1,000 trade articles covering telecommunications, disaster recovery, and critical infrastructure. He has lectured extensively throughout the United States and internationally, including appearances in Santiago, Tel Aviv, and notably in Beijing as a guest speaker for the Chinese Academy of Sciences. A former Mayor and City Council member, Wrobel has designed disaster recovery systems for numerous Fortune 100 firms in the airline, manufacturing, education, financial services, and government sectors. He is a Vietnam-era service disabled United States Air Force veteran.



Sharon M. Wrobel - Board Member and Corporate Secretary

Sharon M. (Ford) Wrobel brings experience in corporate governance, communications infrastructure advocacy, and organizational leadership. She co-authored *Disaster Recovery for Communications and Critical Infrastructure* alongside Leo Wrobel and the Pacific Disaster Center. She serves as a Director and Secretary of the Board for the Network and Systems Professionals Association (NaSPA), a long-standing professional organization focused on technology and infrastructure. Mrs. Wrobel studied at University of Maryland and El Centro College, where she trained in nursing before joining the family's business operations. Her public service includes appointments to the City of Ovilla Planning and Zoning Commission and Historical Commission. She is also a trained storm spotter and holds the highest class of U.S. amateur radio licensing.



Eddie M. Pope - General Counsel

Mr. Pope brings over four decades of legal and regulatory experience spanning telecommunications, administrative, appellate, and corporate law, including service with the Oklahoma Corporation Commission and the Public Utility Commission of Texas. He co-authored *Understanding Emerging Network Services, Pricing and Regulation* published by Artech House Books. Over the course of his career, Mr. Pope has practiced before every level of the Texas court system, argued before the Supreme Court of Oklahoma, and submitted an amicus brief before the United States Supreme Court.



Those most familiar with Mr. Pope's work recognize his enduring influence on the development of modern telecommunications policy in the United States. As Chief of Staff to the Chairman of the Texas PUC during the early era of telecom deregulation, he served as one of the principal final editors of the Texas T2A Interconnection Agreement, a landmark framework that became widely regarded as a national model for telecommunications competition and interconnection policy.

COMING IN JANUARY 2027

THE HIDDEN CRISIS OF 911 CALLS THAT NEVER REACH HELP

What happens when 911 calls cannot get through?

Every day in America, people dial 911 expecting help, but sometimes their calls never reach an emergency center. No ringing. No answer. No record. No one knows they called.

In this eye-opening book, Leo and Sharon Wrobel take you behind the scenes of America's invisible emergency—revealing real stories, system failures, human challenges, and the solutions needed to ensure that no 911 caller is ever unseen.

Drawing on decades of experience in telecommunications, public safety, and emergency communications, they combine heartfelt storytelling with clear explanations, giving readers a deeper understanding of one of the most urgent and least recognized public safety issues of our time.

Because every call for help deserves to be seen.

*“Backup may be nearby.
But nearby is not the
same as notified.”*

*A voice describes the crisis.
A location begins the rescue.*

*Sometimes the distance
between life and death
is the thickness of a single
strand of glass.*



INSIDE THIS BOOK, YOU'LL DISCOVER:



Real stories of people who called 911 but never got through.



The hidden technology failures and system gaps that make 911 calls disappear.



The critical role of dispatchers, first responders, and everyday citizens.



Practical solutions to make every 911 call observable, accountable, and actionable.

REAL CALLS. REAL PEOPLE. REAL CHANGE.

“Because Lives Are On The Line”™

LEO A. WROBEL | SHARON M. WROBEL

Inventors. Innovators. Advocates for a 911 system that sees every call.

www.failsafecomunications.com