

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of	§	PS Docket No. 21-479
Request for Expedited Action	§	PS Docket 13-75
Filed by:	§	CC: PS Docket No. 15-80
FailSafe Communications Inc.	§	PS Docket No. 13-75 ET
	§	Docket No. 04-35

REQUEST FOR ACTION

FailSafe Communications, Inc. (“FailSafe”) respectfully requests that the Federal Communications Commission (“FCC” or “Commission”) grant expedited consideration of our pending July 15, 2025 [Petition for Declaratory Ruling](#). In the nine months since that Petition was filed, no party has submitted any opposition or otherwise argued that providing visibility into failed 911 and 988 originating call attempts would be contrary to the public interest. Continued delay in acting on this matter risks a preventable loss of life. Given the life-safety implications presented herein, expedited action is necessary, appropriate and clearly in the public interest. Attachment A provides an “Executive Summary” of this Request.

*“Whenever I talk about the agenda that I want my colleagues and I to run at the FCC, promoting public safety is always one of the most important points I highlight. And one of the most important things we can do on this front is to make sure that calls to 911 **always go through**.”*

- FCC Chairman Brendan Carr ¹

I. UNSUCCESSFUL 911 CALLS PRESENT A CRITICAL PUBLIC SAFETY GAP

The FCC has long recognized that access to reliable 911 service is a core component of the nation’s communications infrastructure.² When an originating 911 call fails to connect at all however, the caller is invisible to emergency responders. This is a serious threat to life and property.³ Even sophisticated Next Generation 911 (“NG911”) systems do not address this issue because they have no visibility to

¹ See *Facilitating Implementation of Next Generation 911 Services (NG911)*; [Improving 911 Reliability](#), Further Notice of Proposed Rulemaking, Statement in PS Docket Nos. 21-479 and 13-75 (March 27, 2025) (emphasis added).

² See *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102,, ¶ 1 (1996) (“E911 First Report and Order”) (emphasizing the critical importance of ensuring that emergency calls are completed and information is conveyed to public safety authorities).

³ See *Improving 911 Reliability*, PS Docket No. 13-75, 28 FCC Rcd 17476, ¶ 23 (2013) (finding that outages affecting 911 service “put lives and property at risk”).

originating call failures in Communications Service Provider (“CSP”) networks. The result is 911 callers that experience call failure are on their own, and no one knows they are in trouble.

Besides being blind to unsuccessful 911 callers, NG911 deployment remains uneven nationwide and will take years to fully mature.⁴ Recent outages underscore the persistence and geographic breadth of this problem. 911 outages have continued to occur, including numerous, often multi-state disruptions.⁵

The FCC has taken corrective steps by mandating updated outage reporting by CSPs but these reports tend to be based on manual processes that CSPs have rejected as burdensome.⁶ Manual reports can provide only estimates of affected callers. They are prone to duplication and often create “sympathy reports” from numerous CSPs at the same time. These shortcomings demonstrate the need for solutions based on actual call data rather than estimates derived solely from CSP reports.

FailSafe has developed two methodologies that address 911 systems and the CSPs that support those systems. They are called **T911™** and **TeleSentient®**.

II. TWO SOLUTIONS ADDRESS PUBLIC SAFETY GAP IMMEDIATELY

1. T911™ = Visibility Into Failed Emergency Calls

T911™ enables real-time identification of unsuccessful 911 call attempts by leveraging the existing *Intelligent Signaling Networks* (“ISNs”) used by all CSPs. Key features of T911™ include:

- Detection of attempted 911 calls regardless of call completion
- Operation across wireless, wireline, VoIP, and satellite networks
- No requirement to complete or route a voice call
- Generation of near-instant alerts via SMS and email
- Compatibility with both legacy 911 and NG911 systems
- [Demonstrated in person](#) to FCC Staff

4 The present FCC encourages private enterprise solutions but also is aware that some officials need prompting to apply them in their regions. See Chairman Carr’s letter to Governor Newsom on February 10, 2026 which concerns about California’s rollout of NG911. It may be many more years before California has a robust statewide NG911 system. Technologies that backstop NG911 like T911™ while NG911 is being perfected should rightly be pursued.

5 Outages affecting 911 calls continue to happen on a regular basis. In 2026 alone, there have been such outages in Marin County, California, Park County, Wyoming, Lake County, Illinois, Stoddard County, Missouri, Beauford County, South Carolina, Pensacola, Florida, Anderson County, Tennessee, Jackson County, Texas, Crook County, Oregon, Gillespie County, Texas, Waldo County, Maine, and Clinton County, Ohio. The Commission should note that that these are outages that have occurred in less than three full months of 2026. T911™ would have mitigated most, if not all of these outages because it operates outside 911 and NG911 systems, in signaling networks that have 99.999% reliability.

6 See Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications, PS Docket No. 15-80, 31 FCC Rcd 5817 (2016).

Because signaling networks still fire even when calls fail, T911™ identifies callers who would otherwise remain undetected, a critical safety net during outages, congestion events, or system failures.

2. **TeleSentient® = Enhanced CSP Outage Awareness and Compliance**

TeleSentient® extends the same ISNs to support CSP compliance with the Commission’s outage reporting requirements. Specifically, TeleSentient® enables:

- Automated detection of 911 anomalies in the network
- Rapid generation of outage alerts and reports
- Integration with existing FCC systems, [including DIRS and NORS](#)
- Improved attribution of outage responsibility among multiple carriers
- Reduced compliance burden and faster reporting timelines

These capabilities align directly with the Commission’s ongoing efforts to improve outage reporting, situational awareness, and enforcement.

III. **PUBLIC INTEREST BENEFITS ARE SUBSTANTIAL**

FailSafe’s technologies provide significant and immediate public interest benefits:

- **Life-saving potential:** Identification of otherwise invisible emergency callers
- **Network resilience:** Operation independent of 911/NG911 infrastructure
- **Rapid deployment:** Built on existing signaling networks already in use worldwide
- **Regulatory alignment:** Supports FCC objectives for outage reporting and accountability
- **Cost efficiency:** Little to no incremental cost to CSPs

IV. **THIS COMMISSION CAN MAKE 911 SAFER AND COMPLIANCE “AUTOMATIC”**

Despite the many benefits of T911™ and Telesentient® market adoption has been limited due to regulatory uncertainty. Voluntary adoption and compliance alone is insufficient without FCC action.

- Some CSPs have taken a “wait-and-see” approach pending enforcement actions by the FCC
- Some CSPs appear to weigh potential enforcement penalties against implementation costs, largely unaware that those costs are actually minimal
- Some 911 PSAPs face constraints that discourage adoption. Confronted with inadequate resources to handle existing workloads, some would rather not know about invisible 911 callers
- Some 911 Districts and jurisdictions do not understand the current Commission priorities

Absent clear regulatory direction, these dynamics will continue to delay deployment of life-saving capabilities. Commission action, whether through public notice, declaratory ruling, workshops, or other means would provide the necessary impetus for industry adoption and innovation.

V. SIGNALING DATA FROM LIVE CALLERS = NEW USES AND APPLICATIONS

FailSafe recently put out a Request for Proposal (RFP) that can be found on the Inventor's website at www.leowrobel.com/rfp. As a result we are now exploring new uses such as allowing 911 callers that trigger a T911™ alert to receive a “wellness check” from a geographically diverse call center. We are evaluating improved geo-location of wireless callers with another respondent from Spain. We have tested T911™ from Greece, UK, Poland, Uruguay, Australia, and Spain, hinting at an exciting worldwide standard. The U.S. *and this Commission* can take the lead in public safety by allowing Failsafe to introduce *Intelligent Signaling Network* data into the emergency services ecosystem.⁷

VI. SUMMARY AND REQUEST FOR ACTION

Assuring that callers can reach 911 is a fundamental concern of the FCC and an obligation of CSPs.⁸ This Petition advances these interests by (a) identifying failed 911 callers that would otherwise go undetected, (b) operating across all platforms including wireline, wireless, VoIP, and satellite, (c) providing instant alerts to relevant stakeholders. (d) bolstering NG911 infrastructure until it is more mature, and (e) automating outage reporting. FailSafe therefore respectfully requests that the FCC:

⁷ Similar to the FCC introducing ANI (Caller ID) to 911 in 2003. Imagine a PSAP today lacking ANI and ALI capabilities!

⁸ See 47 U.S.C. § 151 (establishing the Commission's mandate to promote “the safety of life and property through the use of wire and radio communication”); see also 47 U.S.C. § 615a-1 (promoting the deployment of 911 services).

1. Issue a Public Notice seeking comment on the Failsafe Petition pursuant to 47 C.F.R. § 1.45;
2. Establish an expedited comment cycle (e.g., 10 days for opposition, 5 days for reply);
3. If necessary, proceed through informal procedures;⁹
4. Consider a workshop or technical forum (if necessary) to evaluate this Request;
5. Proceed expeditiously toward a declaratory ruling or other appropriate action.

Respectfully submitted,

/ s / Eddie M. Pope

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⁹ See 47 C.F.R. §§ 1.2, 1.41; *see also* Amendment of Certain of the Commission's Part 1 Rules of Practice and Procedure, 23 FCC Rcd 16132, ¶ 8 (2008) (affirming flexibility in procedural mechanisms).

ATTACHMENT A

“Three Minute Summary” of Our Request

FailSafe Communications Inc.
Making Failed 911 Callers Visible
Expedited FCC Action Request
PS Docket Nos. 21-479, 13-75, 15-80, 04-35

Slide 1 - The Mission

Ensure Every Call for Help is Seen — Even When It Fails

- Public safety depends on 911 reliability
 - Today: failed calls = invisible callers
 - FailSafe: transforms unseen failures into actionable intelligence
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Slide 2 - The Problem

Invisible Emergency Callers

- Failed 911/988 calls generate no awareness
 - NG911 does not detect originating failures
 - Callers are left without assistance
 - No system-level visibility exists today
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Slide 3 — The Risk

A Preventable Public Safety Gap

- Multi-state outages continue to occur
 - Reporting is delayed, manual, and imprecise
 - Impacted callers are estimated—not identified
 - Result: preventable loss of life
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Slide 4 — Regulatory Context

FCC Priority: Public Safety First

- Ensuring 911 reliability is a core FCC mandate
- Outage reporting reforms underway
- Current frameworks lack real-time caller visibility

Opportunity: Close the gap immediately using existing infrastructure

Slide 5 — The Breakthrough

Two Complementary Technologies

1. **T911™** — Detects failed emergency call attempts
2. **TeleSentient®** — Automates outage detection and reporting

Built on existing Intelligent Signaling Networks (ISNs)

Slide 6 — T911™

Real-Time Visibility Into Failed Calls

- Detects attempted 911 calls (even if never connected)
- Works across wireless, wireline, VoIP, satellite
- No voice connection required
- Instant alerts (SMS/email)
- Compatible with legacy and NG911

Result: Previously invisible callers become visible

Slide 7 — TeleSentient®

Automated Outage Awareness & Compliance

- Detects network anomalies in real time
- Generates automated outage reports
- Integrates with DIRS and NORS
- Improves attribution across carriers
- Reduces compliance burden

Result: Faster, more accurate FCC reporting

Slide 8 — Why This Works

Leveraging What Already Exists

- Signaling networks activate even when calls fail
- No new infrastructure required
- Global compatibility

Key Insight: The data already exists—FailSafe makes it usable

Slide 9 — Public Interest Impact

- **Life-Saving:** Identifies otherwise lost callers
 - **Resilience:** Independent of 911/NG911 systems
 - **Immediate Deployment:** Uses existing networks
 - **Cost Efficiency:** Minimal CSP cost impact
 - **Regulatory Alignment:** Supports FCC priorities
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Slide 10 — Adoption Barriers

Why This Has Not Scaled Yet

- Regulatory uncertainty
- CSP “wait-and-see” behavior
- Misunderstood implementation cost
- PSAP resource constraints

Conclusion: Market forces alone are insufficient

Slide 12 — The FCC Opportunity

Catalyze Nationwide Adoption

FCC action can:

- Provide regulatory clarity
 - Accelerate deployment
 - Align industry incentives
 - Enable innovation in public safety
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Slide 13 — Emerging Capabilities

Beyond Detection: A New Ecosystem

- Wellness check callbacks
 - Enhanced geolocation partnerships
 - Global testing across 6+ countries
 - Potential international standard
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Slide 14 — Vision

From Reactive to Proactive Emergency Response

- Move from outage reporting → real-time awareness
 - From estimates → precise caller identification
 - From silence → actionable alerts
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Slide 15 — Request for FCC Action

FailSafe respectfully requests:

1. Public Notice for comment
 2. Expedited comment cycle
 3. Use of informal procedures if needed
 4. Workshop or technical forum
 5. Path toward declaratory ruling
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Slide 16 — Conclusions

No 911 or 988 Caller Should Be Invisible

The technology exists.

The need is urgent.

The authority rests with the FCC.

FailSafe is ready.

www.failsafecommunications.com