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September 17, 2025

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

RE: REPLY Comments in the FCC Docket 21-479 and 13-75 (FNPRM)

Dear Honorable Commissioners and Staff,

Attached please find our Reply Comments in this proceeding. Please feel free to reach out to either of the signatories below at (512) 689-7815 with any questions or comments.

Best regards,

Leo A. Wrobel

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Eddie M. Pope

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

<i>In the Matter of</i>	§	
Facilitating Implementation of Next	§	
Generation 911 Services (NG911)	§	PS Docket No. 21-479
	§	
Improving 911 Reliability	§	PS Docket 13-75
	§	

REPLY COMMENTS OF FAILSAFE COMMUNICATIONS, INC

I. Introduction

Of the 37 Comments filed in these proceedings so far, none have proposed any concrete plan to achieve meaningful improvements in Next Generation 911 (NG911) as envisioned by the Commission. FailSafe Communications (FailSafe) is the exception. Our T911™ solution offers an immediate, quantifiable, and affordable means to address life-threatening gaps that plague both legacy and NG911 systems.¹ It offers a means for the industry to move beyond discussions and committees toward substantive progress in emergency services. Stated simply, more lives can be saved starting right now.

II. Industry Comments in this FNPRM

Many of the respondents have not grasped this Commission’s objectives, and are advocating the same positions centered on cost and the uncertainty of new regulations. Moreover, while several Comments recommended further forums or task forces, this approaches may be counter productive. It defers action and risks prolonging standards and practices in NG911 deployment that might otherwise be implemented immediately. FailSafe respectfully emphasizes that the Commission need not wait. T911™ is available now, requires no protracted standards development, and directly addresses the many gaps and vulnerabilities we have described across multiple filings with this Agency.²

1 “911 outages and mis-routed 911 calls are not just inconvenient or of annoyance to consumers – they can be the difference between life and death.” Bandwidth Communications Comments at 12

2 Supplemental Ex Parte: <https://www.fcc.gov/ecfs/document/10826017560816/1>
Ex Parte Filing: <https://www.fcc.gov/ecfs/document/108071469211307/1>
FailSafe Comments in this NPRM: <https://www.fcc.gov/ecfs/document/1071163008209/1>
Update in Support of 911 Coalition: <https://www.fcc.gov/ecfs/document/102282791607310/1>
Description of Methodology / Update: <https://www.fcc.gov/ecfs/document/10251170625690/1>
Comments, Description of FCC Demonstration: <https://www.fcc.gov/ecfs/document/10423192929678/1>
Other comments can be found on ECFS dating back to February 2023.

III. The Case for T911™

The most serious issue today is that both legacy and NG911 systems are completely blind to unsuccessful 911 callers.³ T911™ assuages this life-threatening shortcoming by:

- Identifying failed call attempts to 911 and 988 during outages and mass calling events.
- Delivering real-time text and email alerts to Emergency Communications Centers (ECCs), carriers, regulators, and public officials.
- Providing text messages *back* to unsuccessful 911 callers, assuring them that *someone knows they are in trouble* even though their 911 call was blocked.
- Enhancing situational awareness and decision-making during disasters and mass calling events.

T911™ is interoperable across any legacy or NG911 platform, supports multi-vendor environments, eliminates finger-pointing in outages affecting multiple Communications Service Providers (CSPs) and minimizes financial burdens on CSPs. It also reduces Emergency Communications Center (ECC) reliance on carrier-reported outage data based solely on estimates (and honesty), by replacing those reports with empirical data from actual 911 callers.

IV. Other Benefits of T911™

T911™ delivers broad public safety benefits that directly support this Commission's goals:

1. Caller Assurance. Real-time text alerts to 911 callers when systems are unavailable.
2. Situational Awareness. Accurate, empirical information enabling ECCs and the public to make informed decisions. Public officials are never "last to know."
3. Compatibility. Fast, reliable data integration into NG911, supporting lifesaving decisions.
4. After-Action Value. Historical, caller-based data for post-event evaluations.
5. Efficiency. Alerts based on actual failed callers, reducing "sympathy reports."
6. Regulatory Visibility. Alerts to Regulators, as well as CSP legal departments.
7. Resiliency. Resistance to "sunny day" outages since it resides *outside NG911*.

This T911™ solution is both cost-effective and immediately deployable nationwide, with flexible licensing models accessible to municipalities, carriers, and regulators.

3 911 call centers have reported nights when phones were not ringing as a "slow night" only to later realize that the service provider had been down for hours. This is another all-too-common issue that T911™ resolves.

V. Commission Action is Necessary

NG911 operators are expected to eventually achieve “five-nines” reliability - less than 5.26 minutes of downtime per year. Current *Intelligent Signaling Networks* have already achieved this benchmark and represent the perfect backup system during an often-rocky NG911 migration. Moreover, current legacy and NG911 systems fail to account for all of the unseen and unsuccessful 911 callers. This blind spot is a clear and present danger, that undermines the reliability goals set by this Commission and ECCs. It justifies immediate action. The Commission has long recognized the urgent need for improved reliability standards. Adoption of T911™ as a national standard and framework will therefore:

- Ensure no caller is left unseen during emergencies.
- Provide empirical, actionable data to regulators and first responders.
- Achieve unprecedented improvements in reliability, accountability, and public confidence.

VI. Conclusion

In the interest of public safety, FailSafe urges the Commission to take decisive action to incorporate T911™ into the nation’s 911 framework. T911™ represents the most cost-effective and impactful innovation to emerge in more than two decades of emergency communications advancements.

Respectfully submitted,



Leo A. Wrobel
Inventor, FailSafe Founder, and
Chairman of the Board

/S/

Eddie M. Pope
General Counsel