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February 28, 2025

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

**RE: PS Docket No. 15-80
PS Docket No. 13-75
ET Docket No. 04-35**

Update on January 6, 2025 FailSafe Communications Letter in Support of 911 Coalition

Since our previous letter ¹ and at the express invitation of various municipalities, commissions, and purchasing entities here in Texas, FailSafe has been making presentations to 911 agencies that support millions of Texans. During these workshops, and contrary to popular belief, these experts have been surprised to learn that they *do not* have the capability to detect 911 callers who do not get through as described in our previous filings. Upon information and belief it appears that no presently deployed 911 or NG911 system sends alerts unless the 911 caller is *successful*. This fact obviously defeats the idea of being in a position to identify and assist 911 callers that never get through in the first place.

Attached please find our most recent presentation. While some parts are easy to understand, others need further explanation. We therefore continue to invite open dialogue with this Commission, interested elected officials, and the industry. Please feel free to call me at (512) 689-7815 for a Zoom invitation to this presentation. This offer also extends to any other industry experts or participant.

Change is clearly in the air for the way the Washington works. Our methodology takes the regulatory spotlight off recalcitrant carriers, which frankly, never wanted the 911 reporting job in the first place. Instead it focuses on people affected, rather than estimates based solely on carrier performance. For this reason I also invite service providers to contact me as well. This same methodology can be easily adapted to provide FCC carrier alerts based on empirical data, and help avoid severe regulatory fines.

Respectfully submitted,

s/ Eddie M. Pope

Eddie M. Pope
General Counsel

¹ January 15, 2025, FailSafe Communications letter in support of *ex parte* letter by the Association of Public Safety Communications Officials International, National Association of State 911 Administrators, and the National Emergency Number Association (the Coalition). <https://www.fcc.gov/ecfs/document/10115597621449/1>



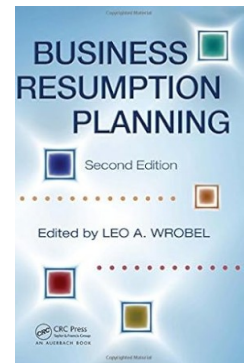
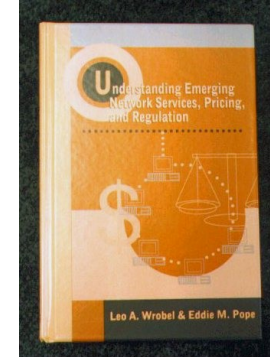
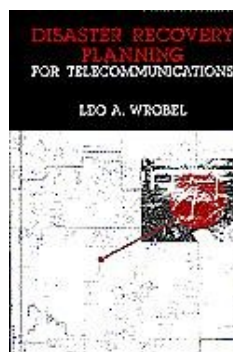
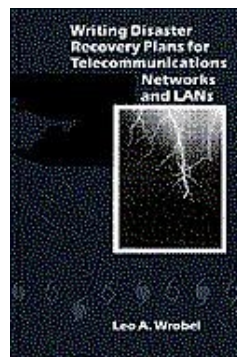
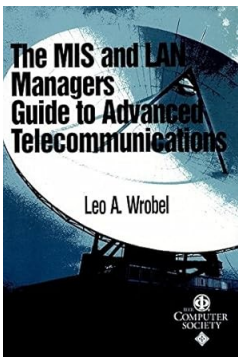
History and General Overview of
TeleSentient® and T911™
for Licensees and Resellers

Non-Confidential Version
January 1, 2025

About The Inventor



- Recognized Worldwide as Disaster Recovery Expert Since 1986
- Built the First Disaster Recovery Center in a Telephone Office
- First in Texas to run phone calls over a Cable TV System
- 12 Books, 1600 Articles, 30,000 Seminar Attendees Worldwide
- Wrote Disaster Plans for some 100 Fortune Companies
- Former Mayor and City Councilman



Our Purpose, Mission, and Team

- On November 22, 2022 the FCC enacted Order FCC 22-88, the biggest change in federal law governing 911 services in 20 years.
- Our Team formed in January 2023 to help carriers comply with these federal laws.
- T911™ is an outgrowth of our efforts on behalf of telecommunications carriers.
- Since April 2024 we have been demonstrating T911™ to regulators and industry due to our methodology's life-saving potential.



Our Reasons for Reaching Out



1. If someone dials 911 but does not get through, does it matter?
2. Should public officials know before Channel 4 does?

We Are Here Today Because Concerned Public Officials Have Answered “Yes” to Both Questions

The “Next New Thing” in 911

- **911** service began in 1968 with the first three-digit emergency call.
- **E911** was mandated by the FCC in 2003 as the next step, which passed the phone number to the 911 center in order to aid in location of the caller. (Can anyone even *imagine* 911 calls today without this capability?)
- **T911TM** is the next logical step. It is used to identify people who call 911 but do not get through during carrier failures, or mass calling events triggered by weather, accidents, school shootings, or other causes.

We convert the *Intelligent Signaling Network* data that accompanies every wireless, landline and I/p call into *actionable 911 alerts*.

Here is how:

How Signaling Networks Work

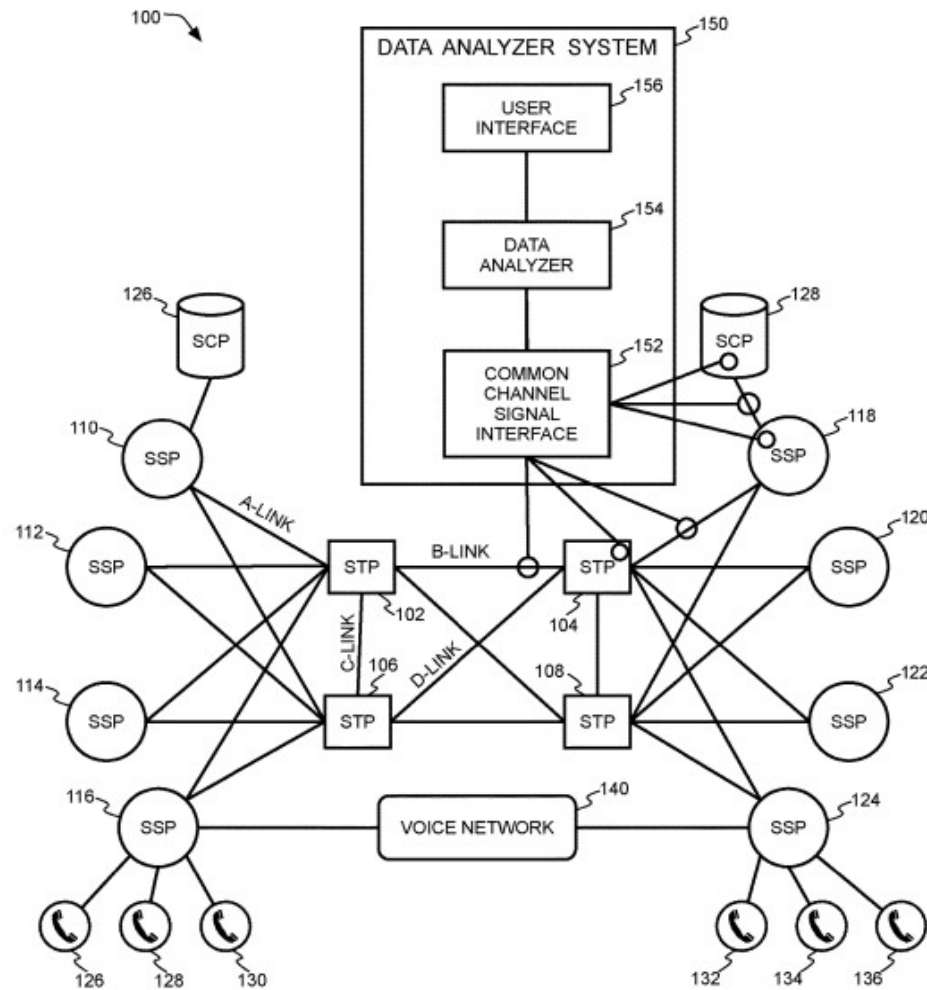


Fig. 1

It's All About Reliability

Hosted I/p Services

- “Three Nines” availability or 99.9% is the industry standard for many web hosted services.
- This translates to over 8 hours of outage per year.
- A “Four Nines” 99.99% up-time percentage is still almost an hour of downtime per year.

Carrier-Grade Signaling Networks

- Carrier Signaling Networks meet “**Five Nines**” or 99.999% availability.
- “Five Nines” equates to only 5.26 minutes of downtime per year.
- “*SS7/C7 might well be the most robust and reliable network in existence.*” ¹

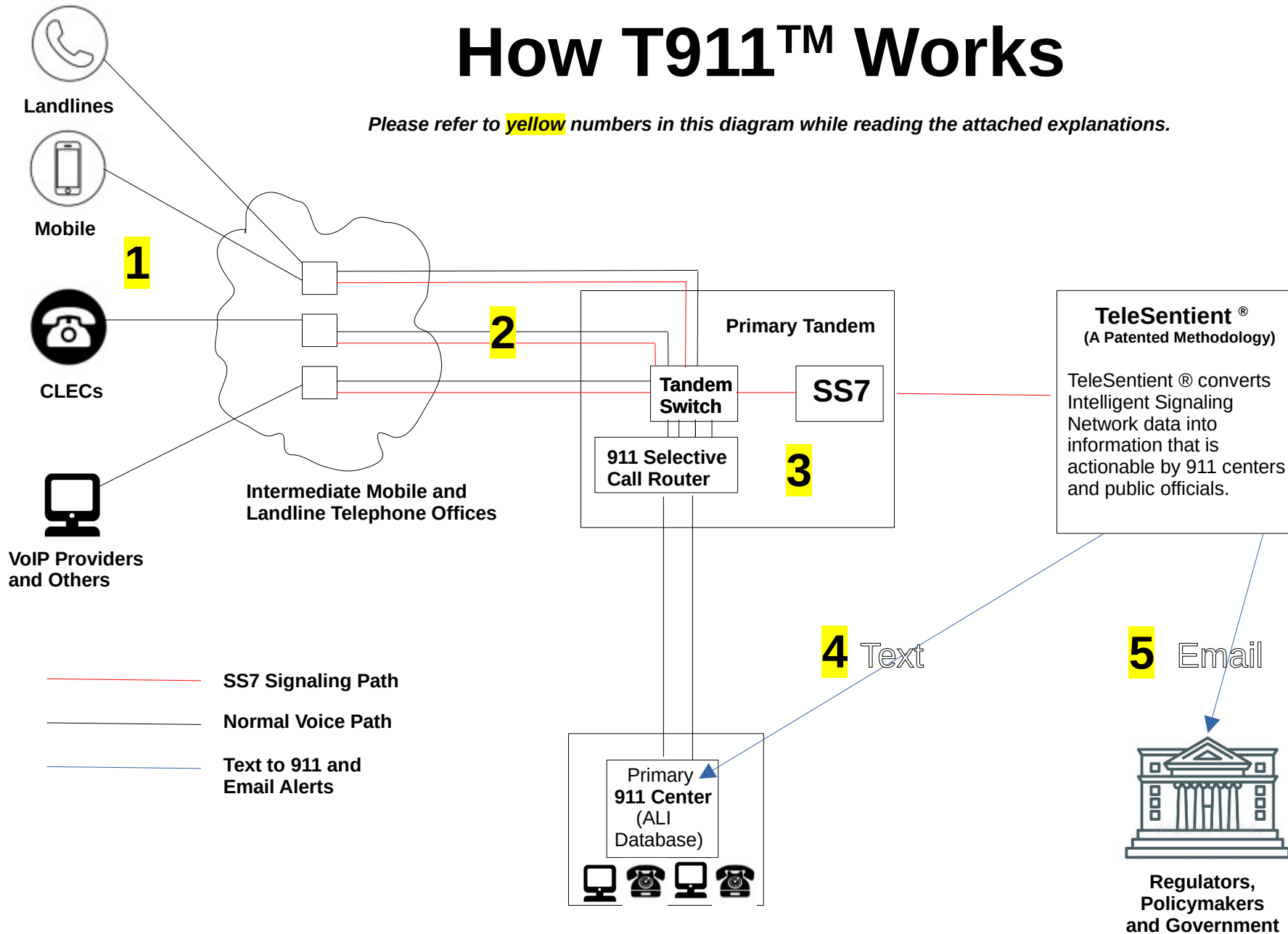
“It took 100 years to achieve “Five Nines” in telecom networks, so Next Generation 911 will not achieve the same level of resiliency overnight. This makes Carrier Signaling Networks the logical companion to NG911.” ²

¹ Source: ***Signaling System No. 7: The Role of SS7*** © Cisco Press by Lee Dryburgh, Jeff Hewett

² Source: FailSafe Communications founder and inventor Leo A. Wrobel

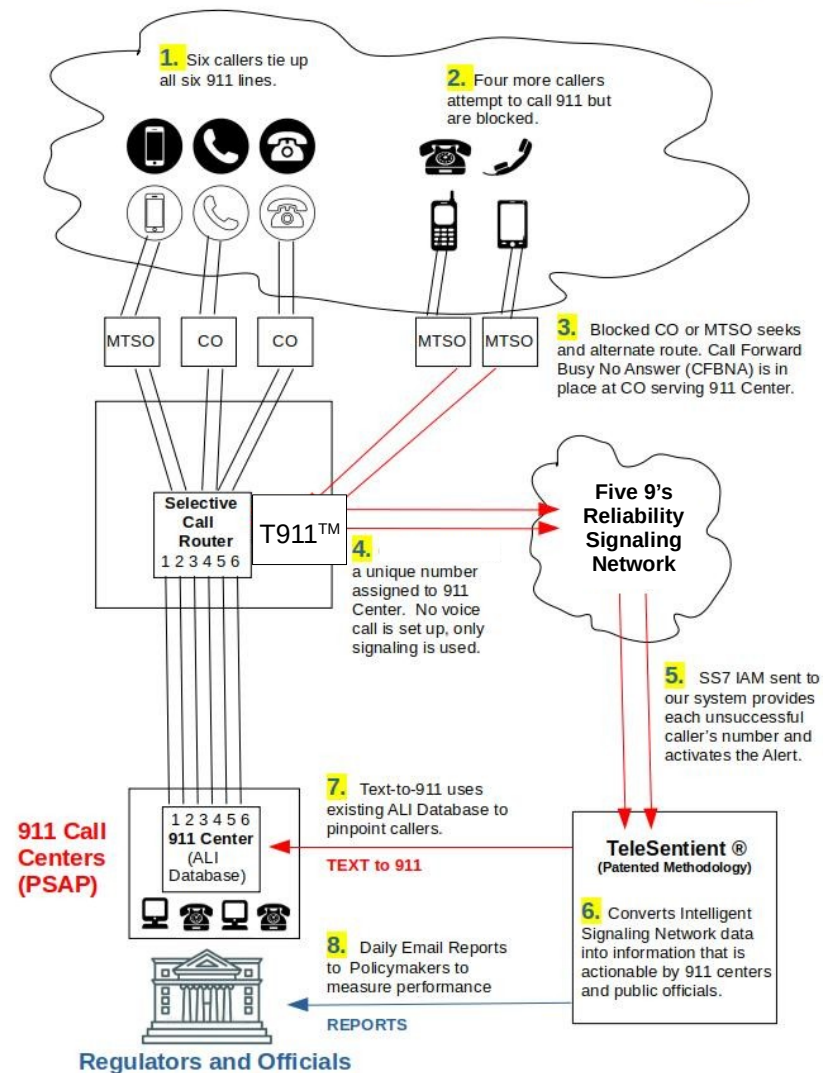
How T911™ Works

Please refer to **yellow** numbers in this diagram while reading the attached explanations.



Why Does It Matter?

It Matters When All Circuits Are Busy



* NOTE: RED ARROWS Signify the use of Intelligent Signaling Network ONLY

It Matters When EVERYTHING Fails

Case Study: The Lahaina Hawaii Wildfires

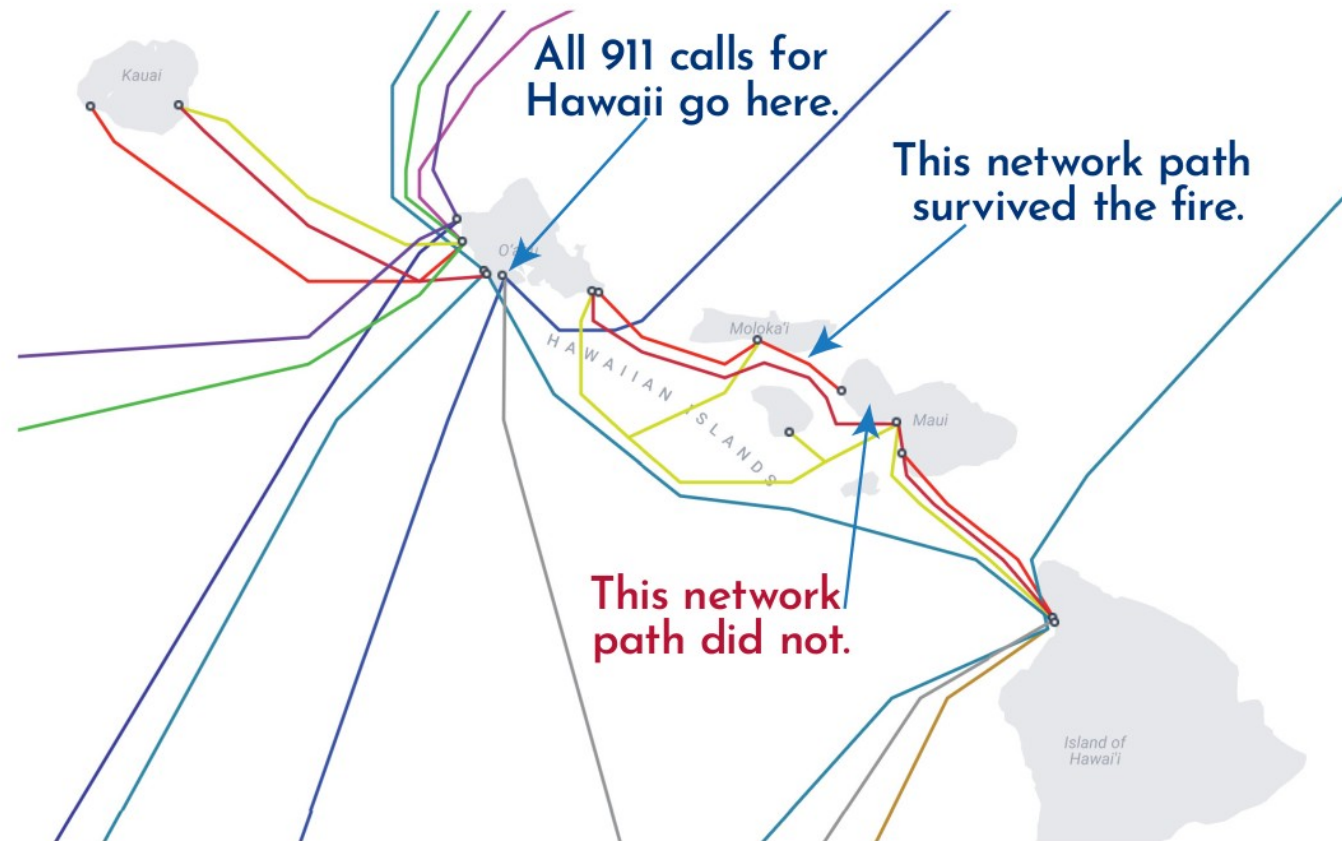


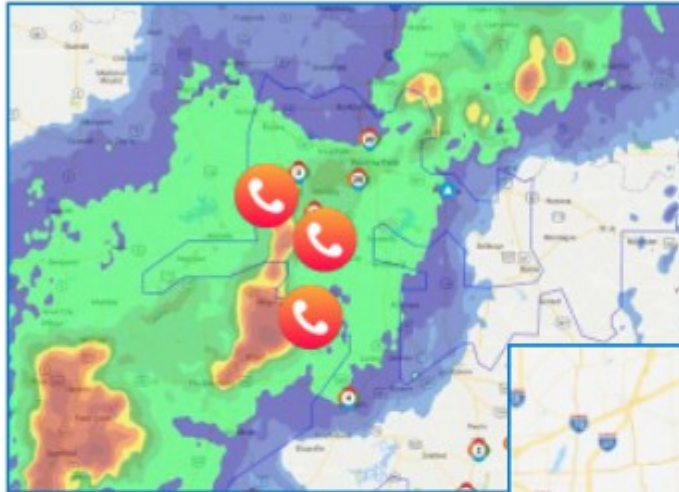
Image courtesy of submarinecablemap.com. Accessed on October 24, 2023.

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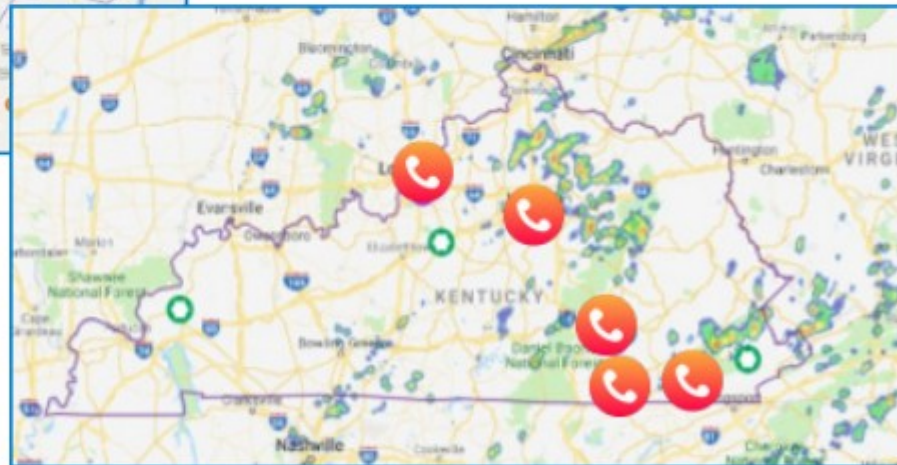
It Matters When You Want to Know *Why*

Users are Correlated with the Cause of Trouble and/or Outage

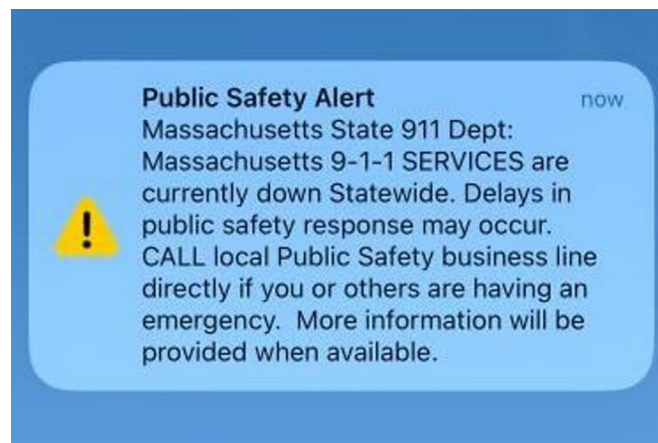
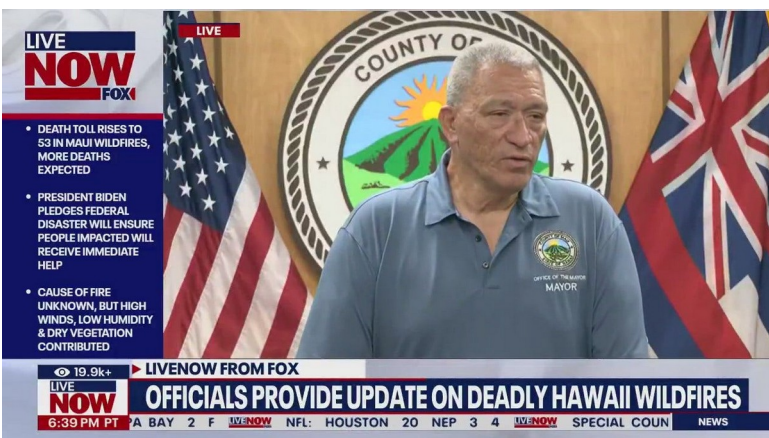
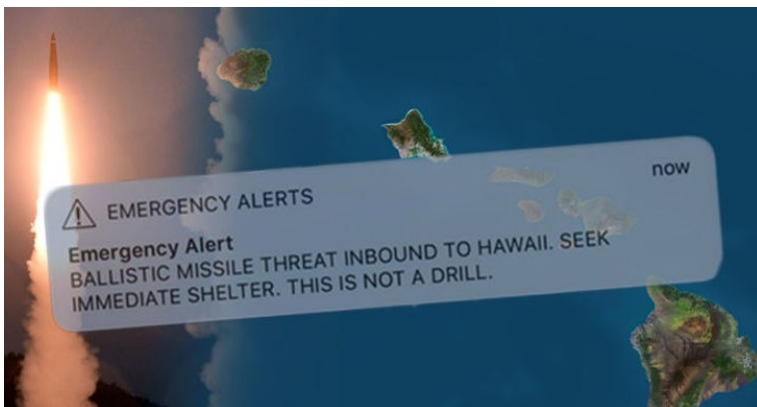


< Phone users in trouble, on the same display with the causes of disaster.

911 callers, including >
the callers that are
not getting through.



It Matters If You Are *Last to Know*



In each case above T911™ either worked, or would have had it been in place.

It Matters to Elected Officials



It Works With Existing 911 Systems

**FOR 9-1-1 EMERGENCIES IN
MASSACHUSETTS:**

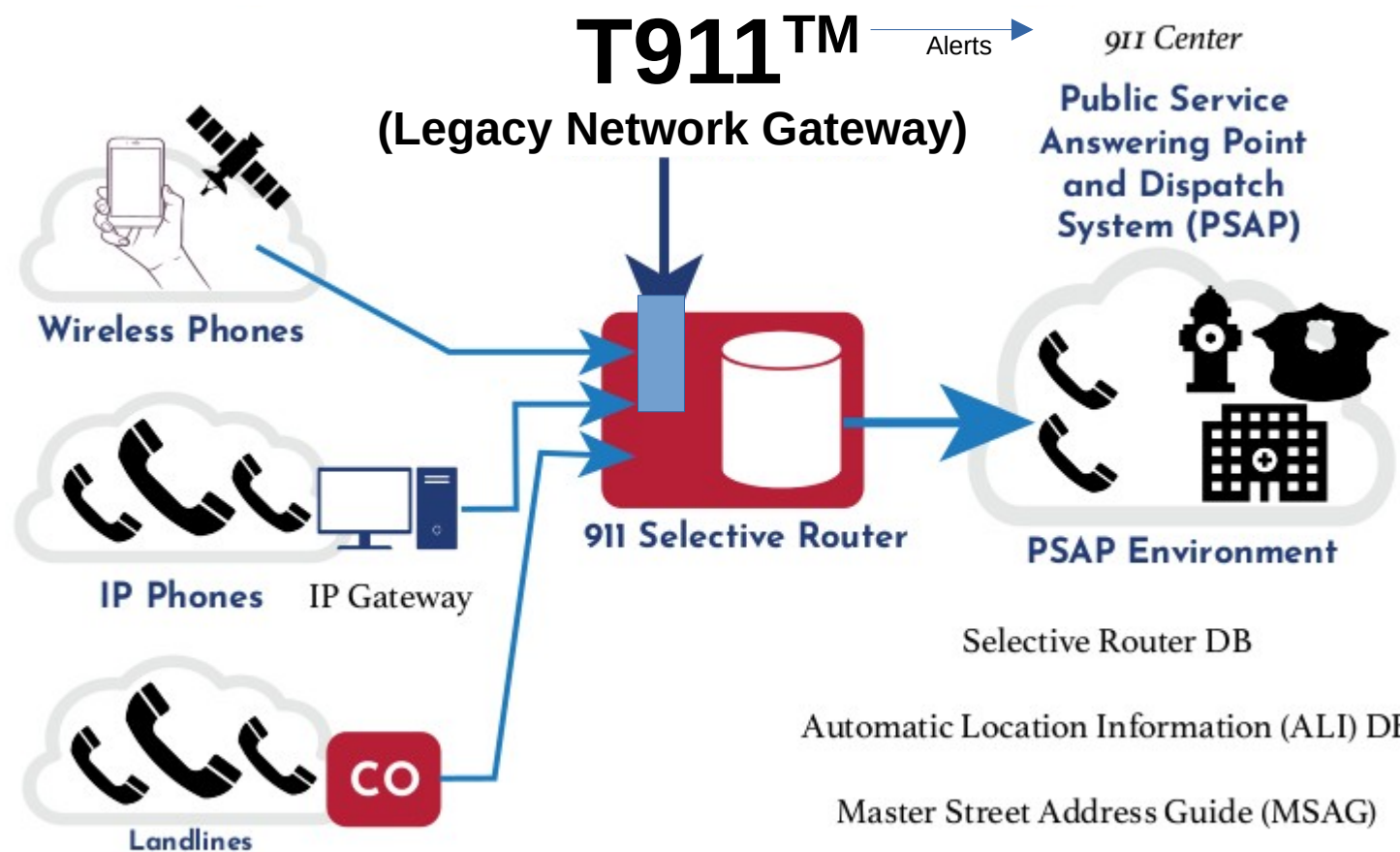
**CALL IF YOU CAN;
TEXT IF YOU CAN'T.**



Source: MA State 911 Department and the
Executive Office of Public Safety and Security

www.mass.gov/e911

The Logical Companion to Next Generation 911 Systems



In Summary:

- **T911™ Matters When All Circuits Are Busy**
- **T911™ Matters When EVERYTHING Fails**
- **T911™ Matters When You Want to Know Why**
- **T911™ Matters If You are Last to Know**
- **An Indispensable Companion for Next Gen 911**
- **T911™ Matters to Elected Officials**



"Because Lives Are On The Line"™

Thank You for Attending

Now on to a **Live Demonstration.**

Please Dial (202) 920-9008 Now
