

**Before the
FEDERAL COMMUNICATIONS
COMMISSION
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Re: Delete Delete Delete |) | GN Docket No. 25-133 |
| |) | |
| Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications |) | ET Docket No. 15-80 |
| |) | |
| New Part 4 of the Commission’s Rules Concerning Disruptions to Communications |) | PS Docket No. 04-35 |
| |) | |
| Improving 911 Reliability |) | PS Docket No. 13-75 |
| |) | |
| Federal-State Joint Board on Universal Service |) | CC Docket No. 96-45 |
| |) | |

**REPLY COMMENTS OF FAILSAFE
COMMUNICATIONS, INC.**

FailSafe Communications, Inc. (“FailSafe”) submits these comments in response to comments of the “Cloud Communications Alliance” (“CCA”).

CCA seeks to have this Commission eliminate the notification requirements to Public Safety Answering Points (“PSAPs”) required by the PSAP Notification Order.¹ CCA raises the exact same objections as were rejected by this Commission when it adopted the Order.

FailSafe is intensely interested in achieving the goals of that Order. We have submitted

¹ *Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications; Improving 911 Reliability; New Part 4 of Commission’s Rules Concerning Disruptions to Communications*, PS Docket No. 15- 80, PS Docket No. 13- 75, ET Docket No. 04- 35, Second Report and Order, 37 FCC Rcd 13847 (rel. Nov. 18, 2022)

numerous comments,² explaining that there are new technologies that can make it easier for carriers to detect and report outages within the 30 minute time frame mandated by the Order. We have also explained that a different approach – which we call T911TM – that allows the PSAP itself to monitor and detect callers that cannot get through to the PSAP.

We have encouraged the Commission and stakeholders to test the FailSafe approaches. We stand ready to demonstrate that those approaches work in the real world. They will provide more tools in the toolchest for both carriers and PSAPs. They are compatible with both existing call-handling technology and next generation technology.

There is no need to delete the PSAP notification rules. This Commission should continue to ensure the safety of every American. FailSafe looks forward to working toward that goal.

Respectfully submitted,

s/ Eddie M. Pope
Eddie M. Pope
General Counsel
Failsafe Communications, Inc.

² 02/28/25 Update <https://www.fcc.gov/ecfs/document/102282791607310/101/15/25>

01/25/25 Comments in Support <https://www.fcc.gov/ecfs/document/10115597621449/1>

10/25/24 Letter <https://www.fcc.gov/ecfs/document/10251170625690/1>

10/18/23 Third Ex Parte Letter <https://www.fcc.gov/ecfs/document/10183004215540/1>

09/06/23 Supplemental Ex Parte Letter <https://www.fcc.gov/ecfs/document/10906728330583/1>

06/20/23 Ex Parte Letter <https://www.fcc.gov/ecfs/document/1062099699039/1>

06/23/23 Reply Comments <https://www.fcc.gov/ecfs/document/10606943017850/1>

04/04/23 Comments <https://www.fcc.gov/ecfs/document/104143031400844/1>