



Eddie M. Pope, General Counsel
100 Ovilla Oaks Dr., Suite 200, Ovilla, TX 75154
Direct: (512) 689-7815 • empope@telesentient.com

August 7, 2025

By Electronic Filing

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

Re: Notice of Ex Parte Filing Facilitating Implementation of Next Generation 911 Services (NG911); Improving 911 Reliability PS Docket Nos. 21–479 and 13–75

Dear Ms. Dortch:

On August 6, 2025 at 2:00 PM two representatives of Dallas-based FailSafe Communications Inc. (FailSafe) met with five members of the Federal Communications Commission (FCC or Commission) staff in discussion about how a revolutionary new companion technology, which employs *Intelligent Signaling Networks* can immediately employed to meet many of the needs and goals of the Commission. The persons in attendance were as follows:

Representing the FCC

Rachel Wehr, Deputy Division Chief, Policy and Licensing Division, FCC
Roberto Mussenden, Attorney Advisor, FCC
Dr. Rasoul Safavian, Electronics Engineer, Public Safety and Homeland Security Bureau, FCC
Daniel Spurlock, Attorney Advisor, FCC
Chris Fedeli, Attorney Advisor, FCC

Representing FailSafe

Leo A. Wrobel, Founder and Chairman of the Board, FailSafe
Sharon M. Wrobel, Corporate Secretary, FailSafe

Detailed Summary of Oral Presentation by Leo A. Wrobel

After introductions of all Parties Mr. Wrobel took the floor and described a methodology that FailSafe has been advocating at the Commission since early 2023 which has been trade named T911™. The patented methodology, he explained, is available nationwide and can be licensed to Service Providers (SPs), 911 districts, municipalities and others in order to answer the two most basic questions concerning the ability of callers to get through to Next Generation 911 (NG911) systems:

1. When a caller to 911 receives a busy signal, does it matter?
2. When many callers are blocked from 911, should public officials (and/or the Commission) know before Channel 4 does?

Since it was evident to everyone in attendance that no reasonable official would answer "no" to either question, Mr. Wrobel launched into a live demonstration of T911™. He asked for volunteers to call the following number from their cell phones: (202) 920-9008. This is the demonstration number that has been proposed to the FCC since April 2024.

A. Three of the FCC staffers in attendance called the number simulating a 911 caller that could not get through. Each received the following text message in return:

Your call has triggered a 911 ALERT and was logged on a SUMMARY REPORT. This is only a test. 911 has not been alerted. www.telesentient.com.

B. At the same instant, Mr. Wrobel (simulating a 911 center with his phone) received three text messages:

TeleSentient has detected a possible service-affecting 911/988 outage in your area. Impacted number (703) XXX-XXXX.¹ Please consult your e-mail for further details and instructions.

TeleSentient has detected a possible service-affecting 911/988 outage in your area. Impacted number (202) XXX-XXXX. Please consult your e-mail for further details and instructions.

TeleSentient has detected a possible service-affecting 911/988 outage in your area. Impacted number (617) XXX-XXXX. Please consult your e-mail for further details and instructions.

C. Mr. Wrobel at the same time received three emails, one for each number that called, with the originating callers' number.

D. Mr. Wrobel then received an E-Mail Summary Report showing all originating callers via a FailSafe email account. He explained that each time more than five callers hit T911™ a similar summary report is generated for public officials so they are never the last to know about problems.

¹ The actual numbers have been redacted to protect the personal phone numbers of Commission Staff.

The participants then proceeded to a second demonstration. This time Mr. Wrobel provided refrigerator magnets² to all physical attendees. In this case the number on the card was (202) 920-9110.

A. Again Mr. Wrobel invited the three participants to dial this number, with each caller simulating a 911 callers not getting through. Again each participant received the text messages shown below:

Your call has triggered a 911 ALERT and was logged on a SUMMARY REPORT. This is only a test. 911 has not been alerted. www.telesentient.com.

B. This time however, the messages simulating the 911 center was not directed to Mr. Wrobel, but to Chris Fedeli, Attorney Advisor, FCC.

TeleSentient has detected a possible service-affecting 911/988 outage in your area. Impacted number (703) XXX-XXXX. Please consult your e-mail for further details and instructions.

TeleSentient has detected a possible service-affecting 911/988 outage in your area. Impacted number (202) XXX-XXXX. Please consult your e-mail for further details and instructions.

TeleSentient has detected a possible service-affecting 911/988 outage in your area. Impacted number (617) XXX-XXXX. Please consult your e-mail for further details and instructions.

C. Three emails were sent to Mr. Fedeli's FCC email account, one for each number that called, with the callers number.

D. Mr. Wrobel then explained that each time more than five callers hit the new demonstration number (202) 920-9110 that a E-Mail Summary Report showing all callers would be sent to Mr. Fedeli's email account. He explained that in an actual implementation of T911TM a similar summary report is generated for public officials so they are never the last to know about problems.

² Refrigerator magnets allow potential callers a quick reference to a back-up emergency number without relying on public officials broadcasting a new emergency number when 911 is not available (as happened recently in Massachusetts and Pennsylvania.) Both magnets and numbers are available for order on our website.

This concluded the demonstration part of the meeting. Mr. and Mrs. Wrobel left approximately 22 refrigerator magnet cards with the number which were taken up by the group. He lightheartedly suggested that if Mr. Fedeli was overwhelmed with texts and emails that both could be easily changed. No one in the group asked for the number or email to be changed.

Discussion subsequently ensued about how T911™ and the other capabilities of *Intelligent Signaling Networks* might help to further the FCC's goals. Mr. Wrobel covered his opinion of the "top ten" ways and committed to include them in this *ex parte* not only as a recap for the Commission attendees, but also "For the industry to see right along with you."

The top 10 ways T911™ and related *Intelligent Signaling Networks* further this Commission's goals:

1. No financial burden to Service Providers (SPs). It's something they already all have that can be easily - indeed almost instantly - repurposed into the 911 and NG911 ecosystems.
2. *Intelligent Signaling Network* messages, at the present time, represent the only interoperable technology that can communicate between Next Generation Core Services (NGCS) provided by different providers. Mr. Wrobel remarked "Sure, it's cool to have my burglar alarm take a picture of an intruder, and send it to a 911 center, but it's not much use if I can't get through. Even in the worst cases, the SMS network would at least tell authorities I was in trouble and that might be all that is needed."
3. The Commission's goals for NG911 include "five nines" / 99.999% availability or 5 minutes a year of outage. *Intelligent Signaling Networks* are already there - they have to be or there would be no calls! Mr. Wrobel cited the 1990 SS7 outage that blocked 65 million calls, remarking "That made it pretty darned important" and further reason why these networks are already 99.999% reliable. Dr. Safavian asked about the potential for hackers to interfere with the SS7 network. Mr. Wrobel stated that the core SS7 network was still largely a "closed" network using point to point circuits which could not be hacked without access to what were once "Class 1" central offices in "the NFL cities." He went on to say that in the interest of cost cutting, many CSPs are choosing to connect to these points however via the internet. He cited Sigtran as one example. One solution would be to harden the closed network and apply standards to the I/p on-and-off ramps but the actual technology got beyond the scope of this meeting. Mr. Wrobel offered to come back to Washington at any time to engage with Dr. Safavian or any FCC staff and found his question relevant and well thought.
4. T911™ works when all else fails. Mr. Wrobel cited instances where alerts traversing the *Intelligent Signaling Networks* employed by T911 worked in Massachusetts during the June 2024 statewide outage. He also cited a case where the methodology would have worked during the tragic Lahaina fire and the reasons why. This included a brief discussion of Extended Erlang Theory and what happens when too many people try to reach 911 at the same time. Again Mr. Wrobel appreciated Dr. Safavian's command of this theory and other lost arts in telecommunications.
5. "Instant Upgrade" for NORS and DIRS. Mr. Wrobel stated that he believes unequivocally that mandating T911™ from CSPs is the least expensive and fastest way to feed meaningful data to NORS and DIRS based on actual 911 callers. He remarked "If suddenly there is a large burst of 911 calls from say, Kansas City Missouri, I would imagine someone would be getting a phone call from this Agency. You can't do that if you don't know it's happening."
6. Mr. Wrobel made a light-hearted remark about himself and his wife Sharon having seven children. "When we would come home and something was broken, nobody ever did it." Setting aside the humor, the

group discussed the issue of 911 consolidation, upstream and downstream providers, how carriers subcontract extensively to one another, and how after every major outage the finger pointing begins. Wrobel pointed out the fact that there are Point Codes in the SS7 environment, along with their corollaries in the I/p environment. The group agreed that finger pointing was an issue and that further discussion about using Point Codes for carrier identification might be a topic for further discussion.

7. Sympathy Reports. Mr. Wrobel stated that the use of Point Code and other data in *Intelligent Signaling Networks* would eliminate Sympathy Reports from multiple carriers about the same outage. He further speculated that CSP's might actually embrace such a posture by the FCC since it would help them avoid chasing problems or issuing alerts for things that are not their problem.

8. Wrobel explained the same methodology works for unsuccessful 988 callers as for 911.

9. One attendee asked if the methodology could target other numbers besides 911 (presumably 311, 611, or 10 digit non-emergency numbers) to which Mr. Wrobel answered that it can, and that is has. He relayed how one of FailSafe's subcontractors used a similar methodology in the early 2000's to target failed 800 calls over a 11 state region.

10. Finally, the meeting ran over but some brief discussion ensued in the hallway afterwards. Mr. Wrobel was asked by Rachel Wehr if the methodology had been deployed yet. Mr. Wrobel replied, "Yes, right here for the last 16 months." He went on to add that FailSafe licenses this methodology under their patent, and is not really looking to build a direct customer base that they would have to service. He told her "we are inventors." As such however, he went on to say that yes, we are in discussions with a number of municipalities and 911 districts that want to sign on directly and that we would do that if asked. As was stated in our filings though, we consider our customers to be licensess which could be Charter, Comtech, Everbridge, Intrado, Motorola, OnSolve, RapidSOS - - SPs like Verizon, Lumen, or T-Mobile and of course large 911 districts who want to sign up directly. He stressed that T911TM is available and that any of these can sign up right now on our website www.fail safecomunications.com for a no cost 30 day trial anywhere in North America.

At the conclusion of the meeting, Mr. Wrobel indicated his willingness to meet again with any of the FCC Staff or stakeholders to discuss further steps.

Respectfully submitted,

s/ Eddie M. Pope

Eddie M. Pope
General Counsel