



Eddie M. Pope, General Counsel
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October 25, 2024

Jessica Rosenworcel, Chairwoman
Brendan Carr, Commissioner
Geoffrey Starks, Commissioner
Nathan Simington, Commissioner
Anna M. Gomez, Commissioner

Federal Communications Commission
45 L St NE
Washington, DC 20554

CC: Debra Jordan
David Furth
Public Safety and Homeland Security Bureau

RE: Request for 911 Industry and Service Provider Forum

Dear Honorable Commissioners:

We read your October 17, 2024 Order in Docket 24-111 with great interest.¹ Congratulations on your role, and that of Intrado and other industry participants, in expediting this lifesaving technology.

This Commission is aware that FailSafe has been conducting a live demonstration of another 911 related system based on its [TeleSentient](#)TM methodology since April 2024.² It has been trade named *T911*TM. T911TM identifies 911 callers that do not get through during hurricanes, school shootings, software failures, and other events that cause everyone to call 911 at once. It also provides timely, automated reports to responsible elected officials that alert them to the condition. (“Attachment A”) Our live demonstration has generated thousands of successful test alerts nationwide over the last six months. The methodology was also described in detail in Docket 11-22, see links below.³

We wish to propose a similar forum to the one utilized in Docket 24-111 in order to seek comment from regulators and service providers regarding this new, and heretofore unutilized, capability.

1 *In the Matter of Implementation of the National Suicide Hotline Act of 2018*. FCC 24-111.

2 The reader can dial **202-920-9008** from a wireless phone right now. It will not alert 911 but it is capable of doing so with the addition of a single “rollover” line feature that is available nationwide. It does not set up a voice call and as such may generate a click or recording during the test but the signaling network data produces 911 alerts as described.

3 <https://www.fcc.gov/ecfs/document/104143031400844/1>
<https://www.fcc.gov/ecfs/document/1062099699039/1>
<https://www.fcc.gov/ecfs/document/1071513465683/1>
<https://www.fcc.gov/ecfs/document/10423192929678/1>

We are presently demonstrating T911™ to government officials and purchasing agents here in Texas. (Attachment “B”) We propose the same live demonstration at a forum in front of you, your staff, and any appropriate industry observers. We have a team of experienced industry leaders to make that presentation. (“Attachment C”) After the demonstration, we invite you and your staff to begin the same “proof of concept” tests (if necessary) as you did with Intrado and other industry experts.

There are few things more distressing to a 911 caller than to receive a busy signal. With T911,™ the PSAP is notified by text message in real time when calls fail, through the use of Intelligent Signaling Network data that accompanies every landline and wireless call. Using the same methodology, public officials receive daily or real time email reports so they know about service affecting issues before the media does. Like the advances advocated by Intrado, T911™ can save lives.

The FCC has been a driving force in E911 and, more recently, NG911. As a veteran-owned business we are particularly grateful for your work in Docket 24-111. We believe you will be convinced to add T911™ to that list of accomplishments. Please contact me at (512) 689-7815 so that we can schedule the forum, as well as seek industry comments on this life saving methodology.

Sincerely,

Eddie M. Pope

Eddie M. Pope



Possible 911 / 988 Outage in Your Area

You are receiving this **Alert** because the TeleSentient® system has detected a possible service-affecting outage in your area. Like the "Check Engine" light on your car, these indications merit further investigation by your company.

If your organization is a TeleSentient® licensee, please consult the outage detail report that was sent to it minutes ago. If you are not a current licensee call 1 (214) 214-SAFE for further instructions, or visit www.fail-safe-communications.com to sign up.

* THIS IS A TIME-SENSITIVE NOTIFICATION. Pursuant to regulations by the Federal Communications Commission your organization is required to report outages that affect 911 and 988 services within 30 minutes. Failure to report these outages may result in significant fines or other sanctions to your company. If you are not sure what to do, please forward this Alert to your legal and regulatory department immediately.



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TeleSentient® is a registered trademark for services provided under U.S. Patents

Subject: FailSafe Daily Summary
From: FailSafe Alerts <alerts@telesentient.com>
Date: 8/23/24, 22:03
To: inventor@telesentient.com



Summary of Possible 911 / 988 Outages in Your Area

You are receiving this **Alert** because the TeleSentient® system has detected **73** possible service-affecting outage(s) in your area. Like the "Check Engine" light on your car, these indications merit further investigation by your company.

If your organization is a TeleSentient® licensee, please consult the outage detail report that was sent to it minutes ago. If you are not a current licensee call 1 (214) 214-SAFE for further instructions, or visit www.fail safecomunications.com to sign up.

Timestamp	Incident ID	Called Number	Calling Number	Email
2024-07-23T23:35:13.8731	3590fa18-494c-11ef-bd28-d91650587889	12109409402	19495107548	inventor@telesentient.com
2024-07-24T00:43:47.1055	c943de84-4955-11ef-847a-fe6c133cf440	12109409402	19495107548	inventor@telesentient.com
2024-07-24T00:45:42.9125	0e4cf880-4956-11ef-aba5-7b05917e0475	12109409402	19495107548	inventor@telesentient.com
2024-07-24T00:55:49.3104	77bd175e-4957-11ef-9820-df5f5b8736bc	12109409402	12142255536	inventor@telesentient.com
2024-07-24T01:03:59.6490	9bfc8248-4958-11ef-a399-3512e8c968dc	12029209008	19495107548	fccdemo@telesentient.com
2024-07-24T01:04:20.1298	a830c5ec-4958-11ef-b830-00f2ee34d06e	18089789379	19495107548	fccdemo@telesentient.com
2024-07-24T01:05:16.2444	c9a766d6-4958-11ef-ad0d-fa31ce15ad82	12029209008	12142255536	fccdemo@telesentient.com
2024-07-24T01:06:45.8532	ff11a43a-4958-11ef-816c-0d78ba2c8570	18089789379	19495107548	fccdemo@telesentient.com
2024-07-24T01:08:32.3541	3e8cc946-4959-11ef-b482-4c1e723d9fe3	18089789379	12142255536	fccdemo@telesentient.com
2024-07-24T01:09:04.7418	51dbae0e-4959-11ef-a757-7baacc028a20	12029209008	12142255536	fccdemo@telesentient.com
2024-07-24T01:09:38.3691	65dab6f2-4959-11ef-ac83-59fcee34d06e	12029209008	12142255536	fccdemo@telesentient.com
2024-07-24T01:10:13.9224	7b12370c-4959-11ef-a917-86fdee34d06e	18089789379	12142255536	fccdemo@telesentient.com
2024-07-24T01:12:17.4820	c4b90520-4959-11ef-9440-8a897ed72b55	18089789379	12148881300	fccdemo@telesentient.com
2024-07-24T01:12:34.7546	cf09de46-4959-11ef-9a32-9f649424be15	18089789379	12148881300	fccdemo@telesentient.com

Attachment B

CITY OF OVILLA RESOLUTION NO. R090924-A

A NON-BINDING RESOLUTION OF THE CITY COUNCIL OF THE CITY OF OVILLA IN SUPPORT OF A 911 UPDATE TO IDENTIFY UNSUCCESSFUL CALLERS DURING DISASTERS AND MASS CALLING EVENTS, AS WELL AS TO ISSUE TIMELY ALERTS TO PUBLIC OFFICIALS, POLICYMAKERS, AND FIRST RESPONDERS.

WHEREAS former Mayor of the City of Ovilla Texas, Leo A. Wrobel (Wrobel) appeared before this body; and

WHEREAS Wrobel described a statewide 911 outage in Massachusetts, and how municipal authorities were unprepared due to the lack of adequate alert systems for responders and policymakers; and

WHEREAS 911 systems have experienced and continue to experience hundreds of outages every year; and

WHEREAS the Federal Communications Commission (FCC) Chairwoman stated on April 18, 2024 *"When you call 911 in an emergency, it is vital that call goes through. The FCC has already begun investigating the 911 multi-state outages that occurred last night to get to the bottom of the cause and impact."*; and

WHEREAS the FCC has issued \$100 million in fines to service providers for miscarried 911 calls; and

WHEREAS Wrobel described how to *identify* 911 callers who do not get through due to overloaded phone lines, as well as the means to *alert* public officials and policymakers when such situations occur; and

WHEREAS this capability has drawn interest from and is being presented to the FCC; and

WHEREAS all North Texas public officials, councils, and municipalities are invited to participate in this demonstration as proof of the concept of pinpointing lost 911 callers; and

WHEREAS Wrobel and his staff desire to implement this potentially lifesaving approach in North Texas; and

WHEREAS Wrobel and his staff have reached out to the North Texas Council of Governments and other entities, where some policymakers have expressed willingness to investigate this capability on behalf of all of North Texas, upon the request of any municipality or other official entity with an interest; and

WHEREAS this non-binding resolution in no way binds the City to any expense or commitment, but only signifies its interest in the capability to respond to blocked 911 callers in time of emergency, subject to terms negotiated by the North Council of Governments or other responsible entity.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF OVILLA, TEXAS:

- A. That this governing body endorses the concept of a '9-1-1' emergency telephone enhancement to allow 911 centers the ability to identify callers that cannot get through due to overloaded phone lines, and, which automatically notifies elected officials and policymakers when those conditions occur.
- B. That it respectfully requests that the North Texas Council of Governments and/ or other responsible entities to explore options for the implementation of such a service, insofar as making it available and affordable to municipalities, districts, and 911 centers under their purveyance.

PASSED AND APPROVED by the City Council of the City of Ovilla, Texas, on this the 9th day of September, 2024.

CITY OF OVILLA



Richard Dormier, Mayor

ATTEST:


David D. Henley, City Manager

Attachment C

Inventor and Management of the Company

Leo A. Wrobel, Inventor and CEO

Wrobel's talent for exploiting changes in laws, technology and regulations has earned him broad acceptance and acclaim. Leo built the first computer disaster recovery center in a telephone central office in 1986. He was the first in Texas to run telephone traffic over a cable television system. In 1997 he founded his own phone company which was the first in the US to become certified in all 50 states. He is the author of 12 books and over 1600 trade articles. He has lectured in most of the 50 states and overseas in locations such as Santiago Chile, Tel Aviv Israel, and as a guest speaker for the Chinese Academy of Sciences in Beijing. A former Mayor and City Councilman, Leo is an expert in complex technology having written disaster recovery plans and designed disaster recovery systems for dozens of Fortune 100 companies in the airline, manufacturing, education, financial services and government services industries. He holds degrees in Business and Public Policy, Telecommunications Systems Technology, and Electronics Systems Technology and is a Vietnam Era US Air Force veteran.



Sharon Wrobel – Board Member and Corporate Secretary

Sharon M. (Ford) Wrobel has authored more than a dozen trade articles and co-authored a book, *Disaster Recovery for Communications and Critical Infrastructure* with husband Leo and the Pacific Disaster Center. She served as a Director and Secretary to the Board of the Network and Systems Professionals Association (NaSPA) a 36 year old 501(c)6. Sharon attended the University of Maryland and El Centro College, where she trained as a registered nurse before joining Leo in his businesses. Sharon also served as a public official, accepting appointments to the City of Ovilla Planning and Zoning Commission and Historical Commission. Sharon volunteers as a Christian dance fitness instructor.



Michael Hatfield – Board Member, President and COO

Michael Hatfield is an experienced executive with a demonstrated history in the management consulting industry, with specialization in finance, business planning, telecommunications network management and national distribution networks for various firms and product lines. He has been President of Greenway Communications since 2016. His broad business acumen has aided clients by skillfully organizing business plans to bring their companies from conceptual ideas to sound profitability. Michael's analytical, team building, sales force management, recruiting and strategic planning skills have proven to be insightful and extraordinary for a wide variety of demanding clients. He specializes in "Out of the Box," non-traditional thinking that energizes new opportunities.



Philip Diehl – Board Member

Philip Diehl is an American businessman and former monetary policy advisor who served as the 35th director of the United States Mint. He is the president of U.S. Money Reserve, a published analyst of gold markets and a member of the boards of the Industry Council for Tangible Assets, the Coalition for Equitable Regulation and Taxation and the Gold and Silver Political Action Committee. He served as director of telephone regulation at the Public Utility Commission of Texas (PUC). In January 1991, Diehl was named legislative director to U.S. Senator Lloyd Bentsen. In September 1992, the Senator promoted him to majority staff director of the Senate Finance Committee. On the first day of the Clinton administration, Diehl moved to the U.S. Treasury Department and was named Chief of Staff to Treasury Secretary Bentsen. Diehl has been recognized by Advertising Age as among its Top 100 in Marketing and received the American Society for Public Administration Government Executive Leadership Award, the Faith and Politics Institute's St. Joseph's Day Award for values-based leadership, and the Treasury Medal for Outstanding Public Service awarded by Treasury Secretary Lawrence Summers.



David Simpson – Board Member

David Simpson has served as Chief of the Federal Communications Commission's Public Safety and Homeland Security Bureau as well as Vice Director of the Defense Information Systems Agency (DISA). He was served as a senior delegate to the 2012 ITU World Radio Telecommunications Conference and to the World Conference on International Telecom (WCIT). From 2009 through 2010, he was Director for Communications and Information Services for U.S. Forces Iraq in Baghdad, where he synchronized strategic and operational level communications for U.S. Forces including crisis communications for afloat and other deployed forces in Europe, Africa, Asia, and South America. He is a 1982 graduate of the United States Naval Academy and earned a master's degree in systems technology from the Naval Postgraduate School.



Donald Benson – Board Member

Don Benson positions have ranged from being manager of command and control systems for the Pentagon, the White House, and the Pacific Theater to senior executive positions in defense, insurance, financial services, healthcare and real estate management. He is skilled in guiding companies through operations consolidations, greenfield start-ups, organization design, change management, culture integration and turnaround situations. Benson has held senior executive positions for such Fortune 500 companies as CIGNA, Aetna, Coventry Health Care and Connecticut General. He holds a Bachelor of Science in Management from Central Connecticut University and also completed continuing studies at The Wharton School, University of Pennsylvania, The Darden School, University of Virginia and Cornell University. He was awarded a Doctor of Humane Letters (Honorary) from Strayer University.



Kathy G. Benson – Board Member

Kathy G. Benson graduated from the University of Connecticut at Storrs magna cum laude and has held various management positions during her career, including Aetna Life & Casualty, Travelers Insurance, Northeast Utilities, Connecticut General Insurance (later CIGNA) Storage Technology, Programming Resources, and finally Synercom, where she was promoted to General Manager. As Founder and Principal of Prosource she oversaw three divisions including software product development, marketing, and financial management. She has extensive experience researching, recommending, and developing new technologies, methods, and standards to help keep her employers competitive in rapidly changing marketplaces.



Mark Allison – Board Member

Mark Allison studied Electrical Engineering at The University of Texas at Arlington. He was employed as an internationally known live sound engineer who provided sound engineering services for, among others, Billy Joel, Barry Manilow, The Beach Boys, The Grateful Dead, Willie Nelson, Bob Dylan, Fleetwood Mac, Elvis, The Boston Pops Orchestra and US Presidents Ford and Carter. After switching careers, he then spent 22 years in avionics engineering at Lockheed Martin Tactical Aircraft Systems in Fort Worth, Texas working on the F-16 program where he retired.



Debra K. Smyth – CFO

Ms. Smyth has an MBA from the Keller Graduate School of Management and over 35 years experience. She has been a key member on many management teams and has played an integral role in the implementation of many company visions including systems development, financial and profitability analysis, planning, tax returns, contract negotiations, benefit plans, exit strategies and insurance plans to suit a specific business need.



Eddie M. Pope – General Counsel

Mr. Pope's experience spans 40 years as an attorney, including the Oklahoma Corporation Commission and Texas Public Utility Commission (PUC). He co-authored *Understanding Emerging Network Services, Pricing and Regulation* ©Artech House Books. The people who know Eddie best appreciate the lasting impact he had on telecommunications. As Chief of Staff to the Chairman of the Texas PUC he was one of the final editors on the first "guide book" governing telecommunications competition. The Texas T2A Interconnection Agreement would go on to become a "gold standard" governing competition in the telecom industry nationwide.

