

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
)  
Federal Communications Commission Seeks to ) PS Docket No. 18-64  
Refresh the Record on Location-Based Routing )  
for Wireless 911 Calls )

**COMMENTS OF APCO INTERNATIONAL**

The Association of Public-Safety Communications Officials (APCO) International, Inc.,<sup>1</sup> offers the following comments in response to the Public Notice seeking to Refresh the Record on Location-Based Routing for Wireless 911 Calls.<sup>2</sup> APCO appreciates the Commission’s continued attention to misrouted wireless 9-1-1 calls and urges the Commission to require service providers to implement location-based routing. As the Commission notes, modern devices are capable of deriving location estimates quickly enough to substantially improve routing<sup>3</sup> and some nationwide wireless carriers have begun implementing location-based routing voluntarily.<sup>4</sup> Routing 9-1-1 calls based on the device’s location rather than relying solely upon cell

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<sup>1</sup> Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 36,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including 9-1-1 Emergency Communications Centers (ECCs), emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

<sup>2</sup> Federal Communications Commission Seeks to Refresh the Record on Location-Based Routing for Wireless 911 Calls, PS Docket No. 18-64, *Public Notice*, FCC 22-42 (rel. June 9, 2022) (“*Notice*”).

<sup>3</sup> *Notice* at 3 (citing Letter from Paul Margie, Counsel, Apple, Inc., to Marlene Dortch, Secretary, FCC, PS Docket Nos. 18- 64, 18-261, 11-153, 10-255 (Sept. 24, 2019) available at <https://ecfsapi.fcc.gov/file/1092477344058/Apple%20PSHSB%20ex%20parte%202019-09-24.pdf>).

<sup>4</sup> *Notice* at 3 (citing AT&T, AT&T Launches First-Ever Nationwide Location-Based Routing (May 10, 2022), <https://about.att.com/story/2022/nationwide-location-basedrouting.html#:~:text=With%20location%2Dbased%20routing%2C%20a,to%20a%2010%2Dmile%20radius> and T-Mobile USA, Inc. (T-Mobile), T-Mobile First to Roll Out Cutting-Edge 911 Capabilities (Dec. 17, 2020), <https://www.t-mobile.com/news/network/tmobile-next-generation-911-location-based-routing>).

sector-based routing will save lives.<sup>5</sup> The technology is available today, and the Commission should act quickly to require service providers to implement it.

Misrouted 9-1-1 calls are detrimental to public safety, introducing delays to emergency response, the potential for information to be lost, and an avoidable detriment to ECC resources. APCO would welcome additional data on the “proportion of wireless 911 calls [that] are delayed” due to misroutes and the “typical length of such delays,” but this may be difficult to determine.<sup>6</sup> The 2019 ATIS study’s estimate that 12% of wireless 9-1-1 calls nationwide are misrouted<sup>7</sup> aligned with anecdotal evidence from APCO’s members, and it’s possible that a misrouted call will introduce a delay of a minute or longer. However, the rate and impact of misrouted calls will likely vary significantly across ECCs given the differences in jurisdictional boundaries, environmental factors, and ECCs’ policies and capabilities. Additionally, there are several reasons why ECCs might lack useful data on the proportion of 9-1-1 calls that are misrouted. For example, an ECC might not track the number of calls that it transfers, or might track them without identifying whether a call was transferred because it was misrouted or for a different reason. Given the consensus among ECCs that misroutes are a problem and the immediate feasibility of carriers to implement location-based routing to mitigate that problem, the Commission should not delay action while waiting for additional data from service providers or ECCs.

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<sup>5</sup> Mark Reddish, New Progress for Getting Wireless 9-1-1 Calls to the Right ECC, TABLETOP BLOG, Sep. 26, 2019, <https://www.apcointl.org/2019/09/26/new-progress-for-getting-wireless-9-1-1-calls-to-the-right-ecc/> (modeling a Commission estimate of the potential lives saved from improvements in 9-1-1 caller location accuracy to estimate that thousands of lives could be saved by location-based routing annually).

<sup>6</sup> Notice at 4.

<sup>7</sup> Alliance for Telecommunications Industry Solutions, Analysis of Predetermined Cell Sector Routing Outcomes Compared to Caller's Device Location, ATIS-0500039 (July 2, 2019).

The Commission inquires about the interdependencies between location-based routing technologies and Next Generation 9-1-1 (NG9-1-1).<sup>8</sup> As APCO has noted<sup>9</sup> and the industry developments cited by the Commission confirm,<sup>10</sup> the implementation of location-based routing is not dependent on progress toward NG9-1-1 such as the deployment of ESInets. AT&T's recent announcement that it is implementing location-based routing nationwide illustrates that wireless carriers can implement location-based routing regardless of whether ECCs have an ESInet in place.<sup>11</sup> Further, it is important to clarify that NG9-1-1, as defined by the public safety community and recent legislative proposals,<sup>12</sup> has not yet been fully deployed anywhere in the United States, and "transitional NG9-1-1" environments entail the deployment of ESInets that are intended to implement some call-delivery elements of an end-state NG9-1-1 environment.<sup>13</sup> NG9-1-1 needs to mean the ability of ECCs to receive new forms of data from the public, process, triage, and analyze this information, and share incident data in a fully interoperable manner with other ECCs and responders in the field. ECCs face significant obstacles to achieving these capabilities, and to succeed, the 9-1-1 community must work toward a common vision of NG9-1-1.

Finally, the Commission asks whether there are costs for ECCs when wireless carriers implement location-based routing.<sup>14</sup> Location-based routing can and should be implemented without imposing additional costs on ECCs.

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<sup>8</sup> *Notice* at 5.

<sup>9</sup> *See* APCO Comments at 4, PS Docket No. 21-479 (Jan. 19, 2022).

<sup>10</sup> *Notice* at 3.

<sup>11</sup> AT&T Launches First-Ever Nationwide Location-Based Routing (May 10, 2022), available at <https://about.att.com/story/2022/nationwide-location-basedrouting.html#:~:text=With%20location%2Dbased%20routing%2C%20a,to%20a%2010%2Dmile%20radius>.

<sup>12</sup> *See*, Public Safety Next Generation 9-1-1 Coalition, <https://ng-911coalition.org/> (last visited July 5, 2022); *see also*, Spectrum Innovation Act, H.R. 7624, 117<sup>th</sup> Cong. (2022) (as amended in House Sub. Comm. on Comm'n. and Tech., June 15, 2022).

<sup>13</sup> *See*, Letter from Jeffrey S. Cohen, Chief Counsel, APCO International, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 18-64 (filed June 1, 2022).

<sup>14</sup> *Notice* at 5.

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