

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

In the Matter of)	
)	
Resilient Networks)	PS Docket No. 21-346
)	
Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications)	PS Docket No. 15-80
)	
New Part 4 of the Commission’s Rules Concerning Disruptions to Communications)	ET Docket No. 04-35
)	

COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials-International, Inc. (APCO),¹ offers the following comments in response to the Further Notice of Proposed Rulemaking in the above-captioned proceeding.² The Commission seeks comment on the reporting requirements for wireless providers pursuant to the Mandatory Disaster Response Initiative (MDRI).³ APCO appreciates the Commission’s continued efforts to enhance the reliability and resiliency of communications networks during emergencies. APCO continues to support the MDRI and expects the reports being contemplated will offer helpful insight into the initiative’s impact on public safety.

¹ 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.

² Resilient Networks, Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications, New Part 4 of the Commission’s Rules Concerning Disruptions to Communications, PS Docket Nos. 21-346, 15-80, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, FCC 22-50 (rel. Jul. 6, 2022) (“R&O and FNPRM”).

³ *Id.* at paras. 49-52.

The MDRI requires providers to submit reports detailing the timing, duration, and effectiveness of their implementation of the MDRI provisions in the aftermath of a disaster.⁴

APCO supports the Commission's proposal to create a standardized reporting form⁵ and further suggests that the Commission mandate use of the standardized reporting form. Mandatory use of a standardized form will facilitate efficient review and increase the usefulness of the reports.

APCO agrees that the reports should include whether a provider roamed, the providers it roamed with, the time period involved, and, if relevant, the time it took for a provider to perform a health assessment and activate roaming.⁶ Additionally, the Commission should ensure that the reports address:

- When a request for roaming was denied and the specific reason given for the denial.
- If roaming could have been requested, but a provider opted not to request it, an explanation of why not.
- For providers that offer Wireless Priority Service, whether these services were supported through the roaming arrangement, and if not, why not.
- How implementation of the MDRI improved access to 9-1-1 and emergency alerts, and if some related services (such as Automatic Number Information and Automatic Location Information) were not supported, why not.
- Relevant provisions of the MDRI other than roaming, such as the extent to which providers shared physical assets and temporary allocation of personnel and took other steps to enhance municipal preparedness and restoration, increase consumer readiness

⁴ 47 C.F.R. § 4.17(c).

⁵ R&O and FNPRM at para. 50.

⁶ *Id.* at para. 51.

and preparation, and improve public awareness and stakeholder communications on service and restoration status.⁷

Finally, the Commission seeks comment on whether the reports should be publicly filed and the potential basis for seeking confidential treatment.⁸ The reports should be publicly available. As the Commission notes, “it is in the public interest for providers to submit an ‘after-action’ report detailing how their networks fared and whether their pre-disaster response plans adequately prepared for a disaster.”⁹ Providing public safety stakeholders with insight into wireless service providers’ implementation of roaming and mutual aid is essential for ensuring the MDRI lives up to its potential to improve resiliency during disasters.

Respectfully submitted,

APCO INTERNATIONAL

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⁷ See 47 C.F.R. § 4.17(a)(ii-v).

⁸ R&O and FNPRM at para. 52.

⁹ *Id.* at para. 33.