

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

In the Matter of	)	
	)	
Single Network Future: Supplemental Coverage from Space	)	GN Docket No. 23-65
	)	
Space Innovation	)	IB Docket No. 22-271

**COMMENTS OF APCO INTERNATIONAL**

The Association of Public-Safety Communications Officials-International, Inc. (APCO)<sup>1</sup> submits these comments in response to the Notice of Proposed Rulemaking (NPRM) in the above captioned proceeding.<sup>2</sup> The Commission seeks comment on a proposed framework for supplemental coverage from space (SCS) to facilitate the integration of satellite and terrestrial networks.<sup>3</sup> APCO appreciates the opportunity to opine on the proposed framework from the perspective of public safety.

I. The SCS Framework Could Benefit Public Safety

As the Commission notes, authorizing mobile-satellite service operations in certain terrestrial bands to permit SCS could have several public safety benefits.<sup>4</sup> Satellite networks can provide coverage to areas where traditional terrestrial communication infrastructure is limited or non-existent. Additionally, satellite networks might remain available during natural disasters or other events that disrupt terrestrial networks. First responders and members of the public could

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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 39,000 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> Single Network Future: Supplemental Coverage from Space, Space Innovation, FCC 23-22 *Notice of Proposed Rulemaking*, GN Docket No. 23-65, IB Docket No. 22-271 (rel. Mar. 17, 2023) (“NPRM”).

<sup>3</sup> *Id.* at para. 1.

<sup>4</sup> *Id.* at para. 25.

benefit from being able to communicate more reliably across a broader geographic area during emergencies, ultimately saving lives.

II. The Commission Should Perform Testing to Evaluate the Risk of Interference to Public Safety Communications

The Commission proposes to authorize SCS operations in several terrestrial bands, including portions of the 700 and 800 MHz bands adjacent to spectrum blocks utilized by public safety<sup>5</sup> and seeks comment on whether to include 700 MHz spectrum currently licensed to public safety in the SCS framework.<sup>6</sup> As a general matter, before SCS is deployed, the Commission should ensure that appropriate, real-world testing is conducted to evaluate this novel framework.<sup>7</sup> Such testing should be conducted in coordination with public safety licensees to evaluate the risk of interference and procedures to detect, identify, and eliminate interference should it occur.

To further mitigate the risk of harmful interference to public safety operations, wireless service providers should be required to notify potentially impacted public safety licensees, FCC-certified frequency coordinators, and relevant regional planning committees prior to provisioning SCS services. Notification should include the date the satellite operations will be deployed and an appropriate point of contact for the wireless service provider and the satellite operator.<sup>8</sup>

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<sup>5</sup> *Id.* at paras. 35, 38.

<sup>6</sup> *Id.* at para. 35.

<sup>7</sup> APCO acknowledges that testing of SCS capabilities is currently underway in several of the proposed bands pursuant to experimental authority and welcomes the Commission's inquiry into the status of such testing. *Id.* at para. 40. However, APCO encourages the Commission to conduct its own, independent field testing to fully investigate not only the ability of each band to support SCS capabilities, but the interference potential of the SCS operations.

<sup>8</sup> Public safety licensees should be notified via email and telephone.

III. Commission Requirements for Supporting Emergency Services Should be Applied to SCS to the Extent Feasible

The Commission seeks comment on whether to extend its wireless 9-1-1 requirements to SCS services.<sup>9</sup> Wireless service providers should be responsible for ensuring that the public has a comparable experience with 9-1-1 regardless of whether the 9-1-1 call was made via terrestrial or satellite communications infrastructure, and it might be appropriate to extend some or all of the Section 9.10 requirements to satellite operators as well. Uniform application of the 9-1-1 requirements will reduce consumer confusion and support the public safety benefits the service providers promise.

APCO understands that SCS is a novel framework and that questions regarding the satellite operators' ability to comply with certain rules may arise. However, APCO cautions the Commission against accepting broad assertions of technical infeasibility. The Commission should require clear and convincing evidence of infeasibility.

Similar considerations should be applied to the provision of Wireless Emergency Alerts (WEA). The Commission seeks comment on how the provision of SCS might improve WEA's availability and reliability in areas underserved by terrestrial wireless service providers.<sup>10</sup> Wireless service providers who participate in WEA should be required to leverage every available technology to ensure WEA messages are delivered to the intended recipients. APCO looks forward to reviewing comments about how collaboration with satellite operators might improve wireless service providers' abilities to deliver effective alerts.

Respectfully submitted,

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<sup>9</sup> NPRM at para. 83.

<sup>10</sup> *Id.* at para. 92.

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