

Comments of APCO International on Transform911 Draft Recommendations April 25, 2022

On behalf of APCO International, we write to express concern with the direction of the Transform911 project and several of the working groups' draft recommendations. APCO is the nation's oldest and largest organization of public safety communications professionals, with over 36,000 members who operate emergency communications centers.

First and foremost, the project's repeated characterizations of 9-1-1 as harmful and inequitable must stop. 9-1-1 is inherently lifesaving and protective. The public relies on the professionalism and skill of public safety telecommunicators whose mission is to keep people safe. Implying that these dedicated professionals are the root cause of inequitable emergency response outcomes is wrong and disrespectful to their public service. Efforts to address social issues and broad reforms to emergency response must be distinct from efforts to improve 9-1-1 as a service and profession. Conflating these issues will result in confusion that overshadows any potentially useful recommendations from the working groups. Accordingly, APCO suggests that Transform911 re-examine the framework within which the recommendations are being presented. It may even be necessary to rename the project something other than "Transform911" to more accurately represent the group's interest in public health, safety, and justice.

Additionally, some of the working groups' recommendations are contradictory to the best interests of the 9-1-1 community and APCO's long-held policy positions. For example, APCO supports state and local control of 9-1-1 and would thus oppose any recommendations that prescribe unfunded mandates or national-level control of ECCs and 9-1-1 professionals. In contrast to this position, the working groups offer recommendations related to mandatory minimum training standards, mandatory national standards for 9-1-1 operations, and mandatory ECC consolidation, among others. APCO opposes one-size-fits-all mandates that violate the longstanding principle of preserving state and local control over 9-1-1.

Even some of the groups' technical recommendations risk undermining the 9-1-1 community's goals. For example, recommendations for interoperability between ECCs and compliance with ANSI standards must take into account the reasons for the current lack of interoperability, such as the use of proprietary technology and ambiguity in technical standards. Fundamentally, service providers should deliver seamlessly interoperable solutions to ECCs without the need for proprietary interfaces or after-the-fact integrations. It should not be the responsibility of the ECCs or the public safety community to conduct interoperability testing or ensure that vendors are complying with technical standards any more than consumers are expected to conduct interoperability testing among smartphone and wireless service providers. Relatedly, the ECC Operations workgroup recommendation to require ECCs to offer all advanced services required by the "i3 standards" is problematic because i3 is one of multiple options within the industry, and it neither describes nor requires the end-to-end communications capabilities needed for a modern, NG9-1-1 ecosystem. Advanced capabilities would be better identified through definitions that have broad support from the public safety community, such as those used in draft federal funding legislation for NG9-1-1.

Finally, while the working groups may include contributions from individual 9-1-1 professionals, we caution against describing the project's work as representing the consensus or best interests of the 9-1-1 community. And once again, we encourage you to be attentive to distinctions between opportunities to support 9-1-1 professionals and improve 9-1-1 center operations, and how to achieve other goals with emergency response and social issues.