CHIEF EXECUTIVE OFFICER
EXECUTIVE DIRECTOR
Mel Maier, CPE
maierm@apcointl.org

HEADQUARTERS
J. Rhett McMillian, Jr. Building
351 North Williamson Boulevard
Daytona Beach, FL 32114-1112
386-322-2500

EXECUTIVE OFFICES
Gregory T. Riddle Building
1426 Prince Street
Alexandria, VA 22314
571-312-4400

www.apcointl.org

BOARD OF DIRECTORS
2026 – 2027

EXECUTIVE COMMITTEE

President
Michael R. O'Connor
moconnor@wescom-9-1-1.org

First Vice President
Jennifer Reese, CPE
jreese@wccca.com

Second Vice President
Brian E. LaMonica, RPL, CPE
svpsd116@gmail.com

Immediate Past President
Jack Varnado, RPL
jvarnado@lpso.org

East Coast Region
Jonathan Goldman, RPL, CPE
David Saffel

Gulf Coast Region
Danny Murray
Ricky A. Rowell, RPL

North Central Region
Jessica M. Loos, RPL, CPE
Cheryl Konarski, RPL, CPE

Western Region
Zach Slattery, RPL, CPE
Karen Sutherland, MS, RPL

Commercial Advisory Council
Jessica Long

November 12, 2026

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, D.C. 20554

Re: Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities, GN Docket No. 13-111

Dear Ms. Dortch:

The Association of Public-Safety Communications Officials International, Inc. (APCO) commends the Federal Communications Commission for taking action to combat the serious risks posed by contraband wireless devices in correctional institutions by facilitating the careful use of radio frequency jamming solutions. As the record and draft Order reflect, contraband cell phones pose an urgent and widespread threat with real consequences for public safety, contributing to violence and enabling drug and firearms trafficking and other criminal activity.[1] APCO also appreciates the Commission's interest in ensuring jamming operations do not interfere with lawful wireless communications. In this regard, APCO believes that additional, targeted safeguards are warranted in light of the record and would further strengthen the Commission's approach, enabling the effective use of jamming while protecting legitimate communications by correctional officers and staff within the correctional facility, as well as by people near or traveling by the facility.

First, APCO supports strengthening the draft Order's notice and participation requirements during the proof of concept and pre-operational testing phases. While APCO appreciates the Commission's recognition of the importance of advance notification to the relevant public safety answering points (PSAPs)

[1] *Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities*, GN Docket No. 13-111, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, Draft on Circulation, FCC-CIRC2611-01 at 3-4 ¶ 3 n.12 (released Oct. 29, 2026) (Draft Order).

and 911 authorities before pre-operational testing,[2] similar public safety considerations also arise during proof of concept testing. Although proof of concept testing may occur at a different correctional facility than subsequent deployments, both proof of concept and pre-operational testing involve the operation of jamming equipment at an actual correctional facility under real-world conditions.[3] Accordingly, APCO respectfully asks that the Commission extend the advance notification requirement to include relevant PSAPs and 911 authorities before proof of concept testing as well. Further, to better support the Commission's goal of affording stakeholders an opportunity to attend and participate, APCO requests that experimental licensees and overlay licensees provide stakeholders with at least 30 days' advance notice of proof of concept and pre-operational testing, respectively. Emergency Communications Centers operate with limited personnel and resources and must balance testing participation with their day-to-day responsibilities. These constraints may be compounded where multiple correctional facilities within a jurisdiction conduct testing within a short period of time. Additional notice would afford public safety stakeholders adequate time to coordinate personnel and resources to meaningfully participate in testing without compromising their other critical responsibilities. Moreover, some ECCs are located near, or even within the same facilities as, correctional institutions. Additional advance notification would provide valuable time for ECC personnel to assess potential impacts from jamming operations and take appropriate steps to safeguard critical public safety communications.

To ensure that the proof of concept and pre-operational testing processes adequately assess potential impacts on emergency communications, APCO also recommends that the Commission require experimental and overlay licensees to conduct 9-1-1 testing, in coordination with the relevant PSAPs and other stakeholders. This testing should assess the ability to successfully place and complete 9-1-1 calls from several locations immediately outside the designated jamming containment area, selected to evaluate connectivity across different serving cell sites, and the results should be documented as part of the proof of concept and pre-operational testing processes. Given the critical importance of reliable access to 9-1-1, APCO believes this testing would provide an important additional safeguard before jamming operations are authorized.

Finally, APCO supports the draft Order's incorporation of common-sense "stop buzzer" procedures that would require immediate cessation of jamming operations in response to credible complaints of harmful interference to authorized users.[4] To ensure the swift identification and mitigation of harmful interference, APCO urges the Commission to require overlay licensees or lessees to monitor radio frequency jamming operations around-the-clock and maintain a point of contact who is available 24/7 to promptly address any issues.

APCO appreciates the Commission's leadership in addressing the urgent and pervasive public safety threat caused by contraband wireless devices and encourages the Commission, as it moves forward, to consider these additional safeguards to protect authorized communications, including calls to 9-1-1.

---

[2] Draft Order at 53 ¶ 119 (requiring advance notice to the relevant Public Safety Answering Point or 911 Authority serving the facility of a correctional facility's pre-operational testing).

[3] Draft Order at 31-32 ¶¶ 69-70, 46 ¶ 102, 52-53 ¶¶ 117-118 (describing conditions for proof of concept and pre-operational testing).

[4] Draft Order at 14 ¶ 28; *see also* Draft Order at 81-83 ¶¶ 186-191.

Carefully deployed, radio frequency jamming can provide public safety agencies with another valuable tool for combating contraband wireless devices.

Respectfully submitted,

APCO INTERNATIONAL

By:

Nicole McGinnis
Chief Counsel and Director of Government Relations

Douglas A. Klein
Senior Government Affairs Counsel

GRO@apcointl.org

CC (via email): Arpan Sura, Katie McAuliffe, Edyael Casaperalta, Marcus Maher, Joel Taubenblatt, Zenji Nakazawa, Jessica Greffenius, David Furth, Ira Keltz