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July 15, 2026

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

Re: Notice of *Ex Parte* Presentation – Docket Nos. 07-100, RM-12002:
*Amendment of Part 90 of the Commission's Rules; Modernization of Part 90
of the Commission's Rules for Next Generation Operations*; Docket Nos. 19-
116, RM-12020: *Qualcomm's Petition for Rulemaking to Allocate Spectrum
and Establish Service Rules for a New Communications Service in Portions of
the 1675-1695 and 5350-5470 MHz Bands*; Docket No. RM-12009: *Safer
Buildings Coalition Petition for Rulemaking on Part 90 Signal Boosters*;
Docket Nos. 13-75, *Improving 911 Reliability*, and 21-479, *Facilitating
Implementation of Next Generation 911 Services (NG911)*

Dear Ms. Dortch:

On July 13, 2026, representatives of the Association of Public-Safety
Communications Officials International, Inc. (APCO) met with Arpan Sura,
Senior Counsel to Chairman Carr and Chief AI Officer, to discuss the need for
public safety professionals to have access to the spectrum resources and
advanced communications technologies they need to protect lives and keep
communities safe.

In the meeting, we highlighted several issues that are critical to strengthening
public safety communications, as reflected in the attached slides as well as in
previous APCO filings in the above-listed dockets. Among other topics, we
emphasized the importance of modernizing the technical requirements for the
4.9 GHz band. The attached Third-Generation Partnership Project (3GPP)
liaison statement, previously submitted to the FCC, explains that current 4.9
GHz emission and power rules must be updated in order to support 5G
capabilities.

In addition, APCO reiterated its support, as expressed in joint comments with
the International Association of Chiefs of Police (IACP), the International
Association of Fire Chiefs (IAFC), and the National Sheriffs' Association
(NSA), for Qualcomm Incorporated's petition for rulemaking that seeks
service rules and a spectrum home for off-network, device-to-device "sidelink"
technology. APCO also noted its support for the Safer Buildings Coalition's
(SBC) petition for rulemaking on Part 90 signal boosters.

Another of APCO's core priorities is maintaining and advancing a resilient 9-1-1 ecosystem that meets the needs of the public and emergency responders. APCO has recently publicized the significant risk posed to public safety by direct-to-ECC alarm notifications, which can overwhelm already-strained ECC resources, degrade response times, and divert attention from true emergencies. The attached position statement on direct-to-ECC alarm notifications, issued jointly by APCO, IACP, IAFC, and NSA, identifies standards and best practices for verifying alarm notifications that can significantly reduce this risk.

Participants on behalf of APCO were as follows:

- Mel Maier, CEO and Executive Director
- Nicole McGinnis, Chief Counsel and Director of Government Relations
- Douglas Klein, Senior Government Relations Counsel
- Michele Farquhar, Partner, Hogan Lovells Cadwalader

We look forward to continuing to work together with the FCC and other stakeholders to help modernize and advance public safety communications.

Respectfully submitted,

APCO INTERNATIONAL

By:

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Attachments

CC (via email): Arpan Sura



Discussion with Arpan Sura

Senior Counsel to FCC Chairman Brendan Carr
Chief AI Officer

July 13, 2026

About APCO

- APCO's over 45,000 members include those who manage, operate, build and support public safety communications systems for law enforcement, fire, emergency medical and other public safety agencies
- APCO's reach spans the entire public safety communications ecosystem, including spectrum management, standards development, professional training and certification, and providing technical assistance and operational resources to agencies nationwide
- APCO serves as the leading public safety subject matter expert on spectrum issues – including legacy transitions, interference protection, and frequency coordination. APCO's spectrum management arm is the nation's leading public safety spectrum coordinator
- APCO's Annual Conference & Expo, Aug. 2-5 in San Antonio, Texas, is the premier event for public safety communications officials, from frontline telecommunicators to comm center managers to public safety communications equipment and services vendors

Spectrum Priorities

Public safety professionals must have access to the spectrum resources and advanced communications technologies they need to protect lives and keep our communities safe

- APCO commends the FCC for its efforts to optimize public safety use of the 4.9 GHz band and spur innovation by enabling the integration of the latest commercially available technologies, such as 5G
- To achieve the FCC's intent, APCO urges modernization of the technical rules for the 4.9 GHz band to align with the standards in the global marketplace
- The Commission should proceed expeditiously with initiating a rulemaking proceeding to enable the deployment of advanced technologies in the 4.9 GHz that will provide life-saving benefits across the country

Spectrum Priorities

- **Sidelink** will support continuity of operations, real-time situational awareness, and coordinated response efforts when traditional networks are unavailable, strengthening public safety's ability to operate during the most critical moments
- APCO, together with the International Association of Chiefs of Police, the International Association of Fire Chiefs, and the National Sheriffs' Association, support Qualcomm's petition for rulemaking to enable the operation of sidelink technology for off-network device-to-device communication
- **Signal boosters** play a vital role in ensuring that public safety communications remain reliable in areas where radio signals would otherwise be blocked – an updated authorization framework would ensure that in-building systems meet responders' needs without interfering with public safety networks

Emerging Issues

- **AI** holds the promise to advance public safety communications, increase efficiencies and help our public safety telecommunicators refocus on their lifesaving work serving communities
- To support the responsible implementation of AI technologies, APCO partnered with iCERT to launch a program to promote the safe and effective use of AI in emergency response and public safety communications systems
- **Direct to ECC Alarm Notifications**, without proper vetting by a qualified intermediary, strain already-limited public safety resources
- Standards and best practices for verifying alarm notifications are necessary to ensure that only true emergencies reach Emergency Communications Centers as calls for service
- **700 MHz** public safety narrowband spectrum might benefit from transitioning to broadband use
- Legacy LMR systems are costly and significantly less spectrum-efficient than LTE technologies



DIRECT TO ECC ALARM NOTIFICATIONS

December 30, 2025

Direct to ECC Alarm Notifications Pose a Significant Risk to Public Safety

Emergency Communication Centers (ECCs), also known as 911 centers and Public Safety Answering Points (PSAPs), are essential lifelines for public safety. ECCs serve as the central hub for receiving, processing, analyzing, and coordinating emergency calls, enabling rapid and effective deployment of police, fire, and EMS personnel. However, ECCs nationwide are contending with escalating workloads and critical staffing deficits. The growing availability of consumer products and services that send calls for service directly to ECCs, without proper vetting by a qualified intermediary, will further strain public safety resources.

Direct to ECC (D2ECC) products and services integrated into the public safety ecosystem must be managed to avoid negatively affecting ECC call volume, emergency dispatch prioritization, and first responder workload. There is a growing concern by the public safety community that with constantly changing technology, many providers of D2ECC services and applications fail to understand that any services they provide that introduce alarm notifications must be properly vetted before transmission to ECCs. Unverified D2ECC applications will place an undue burden on public safety telecommunicators, forcing them to triage every incoming event, regardless of its validity or urgency. It is critical that any services that introduce alarm notifications be properly vetted before transmission to ECCs.

As an example, video manufacturers are marketing “Do-It-Yourself” (DIY) camera systems that claim they will send alerts directly to public safety without any intermediary. This will result in public safety telecommunicators being burdened with needing to triage every video clip received. Emerging cell phone D2ECC Automatic Crash Notification applications also highlight the importance of intermediary vetting before a call for service is created.

Automated calls for public safety assistance place an undue strain on 9-1-1, taking valuable resources away from those who truly have an urgent need for emergency assistance. Public safety agencies previously prohibited automatic voice dialers that called emergency numbers and played pre-recorded messages requesting assistance. Widespread dissatisfaction with these devices led to legislative bans. Absent professional third-party verification, history is poised to repeat itself. Today’s D2ECC applications represent a modern parallel to these automated voice dialers – and the operational challenges they pose to emergency communications will far exceed those of the earlier voice dialer era.

Why professional alarm monitoring and vetting is important

When burglar alarm systems first became widespread, alarm monitoring centers operated under a default response model where virtually every burglar alarm signal resulted in a call to public safety for service. Today, as a direct result of Standard Operating Procedures (SOP) deployed by professional monitoring centers, nearly 90% of residential alarm signals do not result in a call for service.

The chart below shows the significant impact monitoring center SOPs have on reducing calls for service for other monitored alarm services:

Service	Notes	Calls for service eliminated by monitoring center processes
Residential Burglar		~ 90%
Commercial Burglar		~ 75%
Residential Fire	Regulatory driven	~ 70%
Personal Emergency Response		~ 50%
Commercial Fire	Regulatory driven	~ 10%
Residential CO	Regulatory driven	~ 10%

These call reduction statistics are the result of decades of refinement to alarm monitoring center SOPs, to include the implementation of American National Standards Institute (ANSI) accredited standards as well as continued technological innovation.

Empirical data clearly demonstrates the risk of deploying D2ECC applications that do not adhere to proven calls for service and false alarm reduction SOPs. If D2ECC applications are exempt from regulatory compliance and are not verified by a third party, 1,000 alarm signals generated by D2ECC applications will likely result in 1,000 additional calls for service. This increase in volume will overwhelm already strained ECC resources, degrade response times, and divert attention away from true emergencies.

Recommendations

Historically, the negative impact of older generation D2ECC applications on public safety is undisputable. That newer D2ECC applications will have an even larger negative impact on public safety is equally undisputable. Only through a unified position of the public safety community and the cooperation of the alarm notification industry can these risks be effectively mitigated.

Standards and best practices for verifying alarm notifications can significantly reduce the burden on public safety telecommunicators and ensure that only true emergencies reach ECCs as calls for service. The following standards and best practices are documented as significantly reducing calls for service and false alarms. Their mandated use for D2ECC applications by local policy or ordinance should be considered:

Permits and False Alarm Fines – Alarm permits required by ordinance ensure compliance with public safety protocols and enable effective enforcement of false alarm reduction measures, to include false alarm fines. Fining alarm users for false alarms is a proven method to reduce unneeded calls for service.

Enhanced Call Confirmation - Requires an alarm monitoring company to make two attempts to contact the alarm site and/or the alarm user prior to creating a call for service.

Alarm Confirmation, Verification and Notification Procedures – CS-V-01 is an ANSI Standard that defines alarm confirmation, verification and notifications procedures, thus reducing calls for service and is supported by major public safety organizations including the International Association of Chiefs of Police (IACP) and the National Sheriffs' Association (NSA).

Alarm Validation Scoring - TMA-AVS-01 is a recent ANSI standard that provides a standardized method of creating an alarm score metric for unauthorized verified human activity detected by alarm systems, and, providing the alarm score to the ECC when a call for service is created. Proper use of AVS is enforced by Underwriters Laboratories audits.

Support TMA and AICC - APCO, IAFC, IACP, and NSA, have long worked with The Monitoring Association (TMA) and the Alarm Industry Communications Committee (AICC) to promote best practices that reduce the transmission of false alarms to ECCs. We recommend that all providers of calls for service to ECCs work with the public safety community and TMA and AICC to adopt practices that properly vet alarm notifications before transmission to ECCs.

Title: LS regarding emission and output power requirements for 4.9GHz band

Response to: -

Release: Rel-20

Work Item: Introduction of NR TDD 4.9GHz Band for US Operation
(NR_TDD_band_4900MHz_US)

Source: RAN

To: FCC

Cc: RAN4

Contact Person:

Name: Tsuyoshi Shimomura
E-mail Address: tcsimomura@fujitsu.com

Send any reply LS to: 3GPP Liaisons Coordinator, <mailto:3GPP Liaison@etsi.org>

Attachments: -

1. Overall Description:

Consistent with the FCC's Eighth Report and Order (FCC 24-114 Docket 07-100), 3GPP has initiated a work item to develop technical specifications for 5G networks and devices for the 4940-4990 MHz band based on the FCC's existing Part 90 rules. Particular attention was paid to FCC 90.1215 (Power Limits) and FCC 90.210 [m] (Emission Masks). After technical review of the rules in both FCC 90.1215 and FCC 90.210[m], 3GPP has identified numerous cases in which our interpretation of application of the FCC rules would constrain the design and performance of the relevant equipment including deployments with Medium Range and Local Area Base Station classes only. In particular;

1. Issues common to subscriber equipment and base stations

- a. 3GPP 5G technology manages multi-user access via a system of variable time/frequency resource block allocations within the channel bandwidth. However, our interpretation of the FCC 90.1215 power spectral density rules and the FCC 90.210[m] emission mask is that the only valid resource block allocation is one that yields a fixed 90% channel occupancy. This forbids transmission of several key resource block allocations encountered in 5G deployments, examples including full allocations at SCS 30 kHz in 20MHz, 25MHz, 30MHz, 40MHz and 50MHz channel bandwidth, single resource block allocations, and any other allocations not meeting 90% channel use (Observation 2 and 3 [1])
- b. Definition of a 3GPP spectrum emission mask compliant with FCC mask 90.210[m] 0dB reference rules would result in out-of-band attenuation levels that depend on the number of allocated resource blocks. 3GPP believes that although such a mask would comply with the FCC rules, it would not fulfil the FCC's original intentions for out-of-band emission levels for all resource block allocations (Observation 5 [1]),
- c. Given that a variety of channel bandwidths (e.g., 20MHz, 25MHz, 30MHz, 40MHz and 50MHz) will be deployed within the band, rules that allow for consistent out of band emissions to be met with varying channel sizes and power levels are necessary. These rules exist today for other Mid Band spectrum allocations to ensure maximum efficiency in the use of the band.

2. Issues specific to the base station

- a. The in-band power spectral density and conducted transmitter power limits in Part 90.1215 allow insufficient transmitter power for the deployment of Wide-Area base stations, i.e., base stations supporting typical macro cell scenarios [8]

3. Issues specific to subscriber equipment

- a. 3GPP 5G technology employs a system of maximum power reduction techniques to ensure subscriber equipment meets spectral mask requirements in all scenarios. 3GPP studies which investigated the amount of power reduction required for compliance with the 90.210[m] mask indicate that the required power reduction will have significantly negative impacts on cell size, and user [2,3,4,7].

Due to these considerations, 3GPP has determined that, for the 4.9 GHz band, it is unable to;

- a. complete specifications for Wide Area Base Station class and
- b. complete compliant specifications with acceptable performance constraints on subscriber equipment.

3GPP is aware of filings presented to the FCC relative to the 4.9 GHz band which seek modifications to FCC rules for the 4.9 GHz band for the purpose of supporting robust public safety services and 5G macro-cell technologies [9, 10].

2. Actions:

3GPP respectfully asks the FCC to provide guidance on the following questions:

1. Are the 3GPP interpretations of Part 90.1215 and Part 90.210[m] summarized in the references technically correct and consistent with the intent of those rules?
2. Is the FCC considering modifications to the Part 90 rules for the 4.9 GHz band?

3. Date of Next TSG RAN Meetings:

TSG RAN Meeting #112

8th – 11th June 2026 Singapore, Singapore.

TSG RAN Meeting #113

14th – 17th September 2026 Madrid, Spain.

References

- [1] [R4-2602128](#) A-MPR for Band n114, 3GPP TSG-RAN WG4 Meeting #118, Gothenburg, Sweden, Skyworks Solutions, inc.
- [2] [R4-2600632](#) Views on UE RF requirements for the US 4.9 GHz band, 3GPP TSG-RAN WG4 Meeting #118, Gothenburg, Sweden, Apple
- [3] [R4-2600596](#) On n114 UE RF requirements, 3GPP TSG-RAN WG4 Meeting #118, Gothenburg, Sweden, Qualcomm
- [4] [R4-2520291](#) 4.9GHz AMPR Requirement Impact, 3GPP TSG-RAN WG4 Meeting #117, Dallas, USA, Murata Murata Manufacturing Co.
- [5] [R4-2601204](#) Discussion on UE RF issues for US 4.9 GHz band, 3GPP TSG-RAN WG4 Meeting #118, Gothenburg, Sweden, Nokia
- [6] [R4-2601340](#) New 4.9GHz US band - UE RF aspects, 3GPP TSG-RAN WG4 Meeting #118, Gothenburg, Sweden, Ericsson.
- [7] [R4-2600503](#) A-MPR evaluations for n114, 3GPP TSG-RAN WG4 Meeting #118, Gothenburg, Sweden, Huawei.
- [8] [R4-2523028](#) Way Forward for [117][322] NR_TDD_4.9GHz_band, 3GPP TSG-RAN WG4 Meeting #117, Dallas, USA, Fujitsu
- [9] [FCC WP Docket No. 07-100 Petition For Rulemaking](#)
- [10] [FCC Ex Parte, WP Docket No. 07-100, RM-12002](#)