



Leaders in Public Safety Communications®

February 25, 2020

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The Honorable Frank Pallone  
Chairman, Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, DC 20515

The Honorable Greg Walden  
Ranking Member, Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, DC 20515

Dear Chairman Pallone and Ranking Member Walden:

On behalf of the Association of Public-Safety Communications Officials (APCO) International,<sup>1</sup> I respectfully submit this statement for the record to the House of Representatives Committee on Energy and Commerce Subcommittee on Communications and Technology hearing titled “Strengthening Communications Networks to Help Americans in Crisis.” APCO appreciates the bipartisan effort to address issues of importance to public safety. Below, I outline several suggestions related to the legislation being considered.

Network Resiliency

During network outages, directors of 9-1-1 emergency communications centers (ECCs) often learn that there’s a problem with the public’s ability to call 9-1-1 before the carrier notifies the ECC – whether from social media, other 9-1-1 directors, or a drop in call volume. Service providers should provide ECCs with outage information in an easily accessible format that provides situational awareness of the timing, nature, and scope of any impacts to communications with ECCs. The FCC maintains two outage reporting systems – the Disaster Information Reporting System (DIRS) and Network Outage Reporting System (NORS) – but neither of these is sufficiently timely or granular to help ECCs dealing with outages in the moment, and they are not used in all types of outages. ECCs need information that is more timely, streamlined, and granular than these

<sup>1</sup> Founded in 1935, APCO is the world’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 35,000 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.

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systems provide, and the information should be available whenever there's a potential impact on 9-1-1, not just during major disasters or outages. With effective situational awareness of network outages, ECCs will be able to take proactive measures such as advising the public of alternate means to seek emergency assistance.

Relatedly, when a wireless network outage could be preventing calls to 9-1-1, the ECC needs to know how to contact the carrier to gather information that will assist with mitigating the outage's impact. Wireless service providers should establish a secure two-way contact database to ensure that ECCs know who to contact when they suspect an outage and for carriers to know the best way to promptly notify ECCs of known and suspected outages.

### T-Band

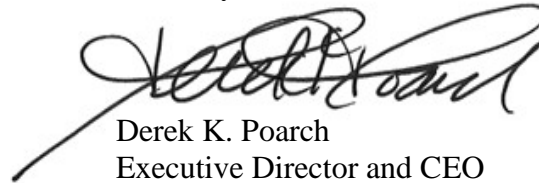
The options for replacement spectrum to account for the loss of the T-Band remain very limited, and the cost of relocating users far exceeds the anticipated value of the spectrum if auctioned. Accordingly, the right thing to do is for Congress to preserve the T-Band for public safety.

### 9-1-1 Fee Diversion

Finally, APCO appreciates the attention being brought to ending the unfortunate practice of 9-1-1 fee diversion. Funds collected for 9-1-1 should not be diverted for other purposes. Ultimately, the goal must be ensuring that 9-1-1 professionals have the resources they need to perform their lifesaving work, including from local, state, and federal sources.

Thank you for your consideration and for your efforts to improve public safety communications.

Sincerely,

A handwritten signature in black ink, appearing to read "Derek K. Poarch", with a long, sweeping underline that extends to the left and under the text below.

Derek K. Poarch  
Executive Director and CEO