Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Modernizing the 911 Framework	 PS Docket No. 26-197

JOINT COMMENTS OF APCO INTERNATIONAL AND THE NATIONAL SHERIFFS' ASSOCIATION

November 16, 2026

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I. INTRODUCTION

The Association of Public-Safety Communications Officials International, Inc. (APCO) and the National Sheriffs' Association (NSA) respectfully submit these comments in response to the Notice of Inquiry (NOI) issued by the Federal Communications Commission.[1] APCO and NSA commend the Commission for continuing to make public safety communications, and 911 in particular, a priority. The recent *NG911 Second Report and Order and Second FNPRM*[2] was a welcome step in the Commission's efforts to facilitate the deployment of a reliable, interoperable, nationwide Next Generation 911 (NG911) system that will bring the benefits of modern communications technology to the public and help keep Americans safer. We also thank the Commission for including the promotion of reliable and Next Generation 911 services as an express goal in its 2026–2030 Strategic Plan[3] and its Performance Plan for Fiscal Year 2027.[4] These planning documents recognize the centrality of public safety to the FCC's

[1] *Modernizing the 911 Framework*, PS Docket No. 26-197, Notice of Inquiry, FCC 26-63 (rel. Oct. 1, 2026) (*NOI*).

[2] *Facilitating Implementation of Next Generation 911 Services (NG911); Improving 911 Reliability*, PS Docket Nos. 21-479 and 13-75, Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 26-39 (June 26, 2026) (*NG911 Second Report and Order and Second FNPRM*).

[3] Federal Communications Commission, *Strategic Plan: Fiscal Years 2026-2030*, at 12 (Objective 2.4: Promote the Public's and First Responders' Access to Reliable 911 and Next Generation (NG) 911 Services), https://docs.fcc.gov/public/attachments/DOC-422816A1.pdf.

[4] Federal Communications Commission, *Agency Performance Plan: Fiscal Year 2027*, at 14-15.

mission[5] and that the Commission can make a difference by adopting policies to ensure that first responders and the American public have access to effective and reliable communications during emergencies.

Founded in 1935, APCO is the nation's oldest and largest organization of public safety communications professionals, with over 45,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems for law enforcement, fire, emergency medical, and other public safety agencies. NSA, founded in 1940, is one of the largest associations of law enforcement professionals in the U.S., representing more than 3,000 elected Sheriffs across the nation dedicated to raising the level of professionalism among Sheriffs, their deputies, and others in the field of law enforcement, public safety, and criminal justice. Together, our members are on the front lines of many emergencies, which gives them valuable insight into the policy issues that come before the Commission.

APCO and NSA are optimistic about the future of NG911 and encouraged by the wave of innovation and new offerings that promote public safety. Thanks to innovation in technology and business models, over-the-top services are able to provide to emergency communications centers (ECCs) location information that often exceeds Commission location accuracy requirements. Sidelink, when deployed, would 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.[6] Increased collaboration between satellite operators and terrestrial service providers through the Commission's supplemental coverage from space framework can improve 911 access in rural and remote areas with little or no cellular coverage.[7] And artificial intelligence holds the promise to

[5] *See* 47 U.S.C. § 151 (creating the Federal Communications Commission "for the purpose of promoting safety of life and property through the use of wire and radio communications," among other purposes).

[6] *See* Comments of the Association of Public-Safety Communications Officials International, the International Association of Chiefs of Police, the International Association of Fire Chiefs, and the National Sheriffs' Association, in RM-12020, WT Docket No. 19-116 (May 7, 2026).

[7] *See* Comments of APCO International in GN Docket No. 23-65 and IB Docket No. 22-271 (May 30, 2024).

advance public safety communications, increase efficiency, and help public safety telecommunicators focus on their lifesaving work serving communities.[8] Together, these developments show how quickly the ways the public reaches 911, and the information available to ECCs, are changing.

In this context, the Commission is wise to "launch a comprehensive examination of [its] 911 framework … to ensure the public can continue to effectively and reliably access emergency services in a way that is consistent with consumer expectations."[9] The Commission should modernize its 911 framework by (1) focusing on reasonable consumer expectations, technical feasibility, and the public interest; (2) tailoring obligations to the functions that particular services perform; and (3) separating 911 requirements from unrelated regulatory classifications. But it should not lose focus on opportunities to resolve pending issues that may serve the interests of public safety in the near term.

II. DISCUSSION

The *NOI* seeks comment on the core objectives of the Commission's 911 framework and on whether and how its longstanding 911 scope criteria should evolve to reflect changes in technology, network design, and the communications marketplace more broadly. We agree with the core objectives and believe that they reflect the need for continuous improvement in 911 capabilities, particularly the acknowledgement that communications must "meet[] the evolving expectations of consumers."[10] As technology and the ways that consumers communicate evolve, so do both consumer expectations and the opportunities for technology to protect the public. It follows that the scope of 911 regulation and the obligations imposed thereby can and should evolve accordingly. As we explain below, such an analysis

[8] *See* APCO International, APCO Seeks Working Group Members to Assist With the Development of New AI Standard (Oct. 8, 2025) (announcing the development of a new operational standard titled Best Practices for Artificial Intelligence Integration into the Emergency Communications Center (ECC)), https://www.apcointl.org/psc/apco-seeks-working-group-members-to-assist-with-the-development-of-new-ai-standard/.

[9] *NOI* at 1 ¶ 1.

[10] *NOI* at 8 ¶ 11.

can be done consistently with the Commission's legal authority and generally need not be tied to categorizations with other regulatory consequences.

A. 911 Scope Criteria

The historical scope criteria should be modernized. First applied in 2003, its factors have never been absolute.[11] In 2026, certain of its components seem especially out of date, including consideration of whether a service offers the ability to both place calls to and receive calls from the public switched telephone network and the extent to which it competes with legacy voice mobile or fixed services. Today, these considerations are not as probative as they may have been in 2003 about either consumer expectations for being able to reach 911 or the technical feasibility that a service would do so.

Rather, in determining whether to impose a particular 911-related obligation on a service or provider, the Commission should ask three questions:

- First, would a reasonable consumer expect the service to provide the ability to reach 911?
- Second, is the obligation technically feasible in light of the functions the service performs, including capabilities that could reasonably be developed in response to Commission requirements?
- Third, would imposing the obligation serve the public interest, considering the resulting public safety benefits as well as costs, effects on innovation, and other potential harms?

Where these considerations favor regulation, the Commission should impose an appropriately tailored obligation without unnecessarily tying that determination to the service's classification for other regulatory purposes.

[11] *See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Report and Order and Second Further Notice of Proposed Rulemaking, 18 FCC Rcd 25340, 25347 ¶¶ 18-19 (2003) (explaining that "we use these criteria in our analysis, but we also consider other factors to inform our decision").

1. Reasonable consumer expectation

The number 911 is now firmly established in American consciousness as the way to reach emergency services. In this regard, the Commission's execution of its duty under section 251(e)(3) of the Communications Act,[12] as enacted by Congress in the Wireless Communications and Public Safety Act of 1999,[13] has been a resounding success. Consumer expectations have naturally followed, and the Commission has recognized the need for technology to keep pace with those expectations. For example, as texting became a primary mode of communication, the Commission adopted requirements that text messages sent to 911 would reach emergency services: first, by requiring bounce-back messages when text-to-911 was not available, and then by requiring support for texting to 911 as ECCs became capable of receiving text messages.[14]

The Commission should continue to put substantial weight on the reasonable expectations of consumers. If consumers expect that a service will allow users to contact emergency services via 911, that expectation should weigh heavily into any consideration of the service's public-safety obligations. Three of the traditional 911 scope criteria—whether a service or device (1) offers interconnected, real-time, two-way voice service; (2) gives users a reasonable expectation of access to 911 and E911; and (3) competes with traditional CMRS or legacy wireline service[15]—may contribute to the reasonableness of such an expectation, and can be encompassed within a single criterion (updated to include NG911): whether the service or device gives users a reasonable expectation of access to 911, E911, and NG911. For example, users today may expect that a service that provides the capability of placing voice calls to ten-digit

[12] 47 U.S.C. § 251(e)(3) ("The Commission and any agency or entity to which the Commission has delegated authority under this subsection shall designate 9–1–1 as the universal emergency telephone number within the United States for reporting an emergency to appropriate authorities and requesting assistance.").

[13] Pub. L. No. 106-81, 113 Stat. 1286 (1999).

[14] *See Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment*, PS Docket Nos. 11-153 and 10-255, Report and Order, 28 FCC Rcd 7556 (2013) (*Bounce-Back Order*); Second Report and Order and Third Further Notice of Proposed Rulemaking, 29 FCC Rcd 9846 (2014).

[15] *NOI* at 8 ¶ 13 (listing four "911 scope criteria"). The fourth, technical feasibility, is discussed next.

telephone numbers will also provide the capability of reaching 911, despite not qualifying as "interconnected" under current FCC rules.[16] Insofar as the Commission's legal authority would support doing so, and absent strong public-interest considerations to the contrary, the provider of such a service should be responsible for satisfying those expectations to the extent technically feasible.

2. Technical feasibility

Consistent with the fourth traditional 911 scope criterion,[17] the Commission should impose a 911-related requirement on a service only to the extent that compliance is technically feasible in light of the functions that the service performs or could reasonably be expected to perform. Technical feasibility should thus inform both whether an obligation can reasonably be imposed and which entities are appropriately positioned to satisfy it. For example, location-accuracy obligations designed for originating service providers (OSPs) do not make sense for ESInet providers, which carry and route 911 traffic but do not originate calls or determine a caller's location. Similarly, because a subscriber to a non-fixed interconnected VoIP service may use the service from more than one location, the Commission does not require such a service to determine the customer's location but allows it to use "Registered Location," provided the user can update the Registered Location at will and in a timely manner.[18]

Technical feasibility is not necessarily static, however. A capability may be technically feasible even if achieving it would require reasonable further development of technology or standards. Indeed, FCC leadership can drive technical development toward the most beneficial outcomes rather than entrenching incompatible technologies. The Commission has successfully encouraged such development in the contexts of location accuracy, location-based routing, and areas outside of the 911 realm, such as

[16] *See* 47 CFR § 9.3 (defining *interconnected VoIP service* as, *inter alia*, one that permits users generally to receive calls that originate on and to terminate calls to the public switched telephone network).

[17] *See NOI* at 12-13 ¶¶ 23-25.

[18] *See* 47 CFR § 9.11(b)(4)(ii)(B).

emergency alerting.[19] Thus, for example, APCO, NSA, and our Public Safety Next Generation 9-1-1 Coalition partners have called for mandating core NG911 interoperability capabilities, even if doing so requires development of new technical standards.[20] The relevant question at this stage of the analysis should be whether the desired capability can reasonably be achieved, not whether industry already delivers it. Whether the benefits of requiring development of that capability justify doing so is a separate public-interest question.

Harmonizing 911 obligations across services[21] is a sensible overarching goal because it reflects consumer expectations: users generally do not distinguish among technologies or providers when dialing 911 and may expect the same result. But harmonization does not always reflect what is technically feasible. Different services perform different functions and have different capabilities, and a uniform requirement may be unworkable when a service cannot perform the function necessary to comply. In such circumstances, imposing an infeasible requirement might have the effect of prohibiting the offering of the service, which often will not serve the interests of public safety.[22] On the other hand, the Commission should not establish requirements, in pursuit of harmonization, that would allow services to meet a lower threshold when it is technically feasible for them to do better. The Commission should therefore pursue

[19] *See* 47 CFR § 9.10(f)-(j) (providing phase-in periods for various location-accuracy requirements); *Location-Based Routing for Wireless 911 Calls*, PS Docket No. 18-64, Report and Order, 39 FCC Rcd 527, 531-37 ¶¶ 7-16 (2024) (discussing the development of technology for location-based routing alongside an FCC inquiry and rulemaking proceeding); *Wireless Emergency Alerts; Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System, Second Report and Order and Second Order on Reconsideration*, 33 FCC Rcd 1320, 1331-32 ¶ 14 (2018) (recognizing "the urgent public safety benefits of enhanced geo-targeting" for emergency alerts while recognizing that the requirement it adopts "will necessitate completion of ongoing standards development").

[20] *See* Reply Comments of the Public Safety Next Generation 9-1-1 Coalition, PS Docket Nos. 13-75 and 21-479, at 6-9 (Sept. 8, 2026).

[21] *See NOI* at 13-14 ¶¶ 26-29.

[22] Conversely, there may be instances where prohibiting a service might serve the public interest rather than allowing it to be provided without public safety protections. *See Nuvio Corp. v. FCC*, 473 F.3d 302, 311 (Kavanaugh, J., concurring) ("[T]he FCC possesses the statutory authority, which the Commission may reasonably choose to exercise, to address the public safety threat by banning providers from selling voice service until the providers can ensure adequate 911 connections.") (D.C. Cir. 2006). *See also infra* part II.A.3.

harmonization where it serves the public interest, but it may often be more appropriate to calibrate each technical requirement to the actual capabilities of the service to which it applies.

3. Public interest

Having determined that a capability is reasonably achievable, the Commission must determine whether the public safety benefits of requiring it justify the costs and other consequences of doing so. The Commission can and should adopt rules imposing 911-related obligations only to the extent the public interest requires doing so. This allows the Commission to pursue its mandate to promote public safety while taking a wide range of factors into consideration.

One circumstance in which imposing regulation may serve the public interest is where, due to the failure of markets to demand a capability, no entity is offering a service or reaching an outcome that would be both technically feasible and beneficial to the public. In such circumstances, the Commission could consider requiring communications providers to develop such new capabilities. Outage reporting is an area where the Commission has imposed helpful requirements on entities subject to its 911-related rules but more work could be done to improve public-safety outcomes. For example, the generation of a web-based outage dashboard that graphically details an outage's location, nature, and expected resolution time is technically feasible—as evidenced by utility companies' usage of such displays for their customers. Such a dashboard would greatly benefit ECCs and the public at large by allowing for improved outage awareness, response coordination, and mitigation efforts.

Regulation could also serve the public interest in circumstances where parties voluntarily offer services that exceed Commission requirements or add new value but do so in a way that could result in other negative consequences. For example, providers may offer a service that, while useful and permissible, does not use commonly accepted standards. Such a service could undermine other overarching and important Commission objectives, such as promoting interoperability. Deployed widely over time, such unregulated offerings could threaten to introduce and embed incompatibilities in the

larger 911 ecosystem, in which case the Commission should consider whether, absent regulation, the resulting inefficiencies and potential harms outweigh the added value of the service itself.

Direct-to-ECC ("D2ECC") alarm notifications are another example of a service that emerged in response to market demand where unchecked expansion may pose risks that harm public safety. When products and services integrated into the public safety ecosystem send alerts directly to ECCs without any intermediary, they take valuable resources away from those who truly have an urgent need for emergency assistance. APCO, NSA and others have stressed the need for standards and best practices for verifying alarm notifications to be adopted by local policy or ordinance, and further developments in this area warrant tracking by the Commission and consideration in its 911 framework.[23]

In other circumstances, the public interest may weigh against regulation. Where the needs of public safety are being met, where parties are providing innovative new services that do not detract from the public safety protections offered by others, or where others are providing services with the potential to enhance public safety without harming collective efforts (such as interoperability), the Commission should not regulate. To the extent existing regulatory requirements impede the deployment of such services, the Commission should consider appropriate waivers or forbearance from those requirements.

B. Legal Authority

The *NOI* seeks comment on how the legal authorities upon which the Commission has relied apply in today's communications ecosystem and support its objectives.[24] We believe that the Commission's statutory authorities fully support the multifactor 911 scope analysis discussed in part II.A above and, as discussed in part II.C below, need not have consequences in other areas of FCC regulation.

[23] *See* APCO International et al., *Direct to ECC Alarm Notifications* (Dec. 30, 2025), *attached to* Letter from APCO International to Marlene H. Dortch, Secretary, Federal Communications Commission, Docket Nos. 07-100 et al. (filed July 15, 2026), *available at* https://www.fcc.gov/ecfs/document/26110019674/4.

[24] *NOI* at 15 ¶ 31.

As the Commission has recently explained,[25] numerous provisions in the Communications Act of 1934 and other 911-related statutes grant the Commission both broad and specific legal authority to pursue its responsibility to protect public safety through use of the nation's 911 system. Section 251(e)(3) of the Communications Act makes the Commission responsible for establishing 911 as the universal emergency telephone number for both wireline and wireless telephone service, which courts have recognized shows Congress's intent that the Commission have broad authority for ensuring that 911 service is available throughout the country.[26] More broadly, the Commission's Title II authority over common carriers has provided another basis for regulating the provision of 911 service, including when it adopted the 2013 reliability rules.[27] Provisions of Title III provide broad authority and wide discretion over all wireless licensees, the services they provide, construction permits, and radiofrequency equipment.[28]

Additional statutory provisions empower the Commission to require the provision of adequate 911 service by wireless and interconnected VoIP providers, including the NET 911 Improvement Act of 2008,[29] which specifically charges the Commission with modifying its rules applicable to IP-enabled voice service providers "as necessitated by changes in the market or technology."[30] The Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA) recognizes that one of the key duties of the Commission for protecting individuals with disabilities is to ensure the reliability and

[25] *NG911 Second Report and Order and Second FNPRM* at 62-68 ¶¶ 158-169; *Facilitating Implementation of Next Generation 911 Services (NG911); Improving 911 Reliability*, Further Notice of Proposed Rulemaking, 40 FCC Rcd 2668, 2710-14 ¶¶ 111-118 (2025) (*NG911 Reliability FNPRM*).

[26] *Nuvio Corp. v. FCC*, 473 F.3d 302, 311 (D.C. Cir. 2006) (Kavanaugh, J., concurring).

[27] *See NG911 Reliability FNPRM*, 40 FCC Rcd at 2711 ¶ 112; *Improving 911 Reliability; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket Nos. 13-75 and 11-60, Report and Order, 28 FCC Rcd 17476, 17529 ¶ 149 (2013).

[28] *See, e.g.*, 47 U.S.C. §§ 301, 302a, 303, 307-310, 316, 319, 332, 333. *See Bounce-Back Order*, 28 FCC Rcd at 7588-92 ¶¶ 90-99.

[29] 47 U.S.C. § 615a-1(a) (imposing a duty on all IP-enabled voice service providers to provide 911 service in accordance with FCC rules), (c) (requiring the Commission to issue, and allowing it to modify, such rules from time to time).

[30] 47 U.S.C. § 615a-1(c)(3).

interoperability of the nation's NG911 network,[31] and it is now well established that the Commission's NG911 authority under the CVAA provides authority over the facilities that are most critical to modern NG911 networks and is not limited to adopting disability-specific requirements.[32]

The Commission also has an express delegation to expand the definition of IP-enabled voice service, and thereby expand the applicability of related regulatory obligations, through rulemaking.[33] Furthermore, it remains true that the Commission may adopt rules to serve the public interest when it has subject-matter jurisdiction under Title I of the Act and doing so is reasonably ancillary to the effective performance of its statutory responsibilities.[34] This authority is never stronger than when the Commission is exercising its statutory duty to protect public safety.[35] The exercise of this authority is informed by both Title II and Title III of the Communications Act as well as its other direct sources of authority.[36]

These authorities also support a function-based approach to 911 regulation. Congress has repeatedly assigned the Commission responsibility for ensuring nationwide access to emergency services while recognizing that the technologies used to provide that access will evolve. Accordingly, where an entity performs a function integral to originating, transmitting, routing, locating, or completing a 911 communication, the Commission may tailor requirements to that function under the statutory authority applicable to the entity and service at issue. This approach does not require the Commission to classify an

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[31] *NG911 Second Report and Order and Second FNPRM* at 63-65 ¶¶ 160-162.

[32] *NG911 Reliability FNPRM*, 40 FCC Rcd at 2712-13 ¶¶ 114-115.

[33] *See* 47 U.S.C. § 615b (defining *IP-enabled voice service* with reference to the Commission's definition of *interconnected VoIP service*). *See Loper Bright Enterprises v. Raimondo*, 603 U.S. 369, 144 S. Ct. 2244, 2263 & n.5 (2024) (explaining that statutes that "expressly delegate[]" to an agency authority to give meaning to a particular statutory term are to be interpreted to effectuate the will of Congress subject to constitutional limits).

[34] *See, e.g.*, *Protecting our Communications Networks by Promoting Transparency Regarding Foreign Adversary Control*, Notice of Proposed Rulemaking, 40 FCC Rcd 3730, 3766 ¶ 8 (2025) (tentatively concluding that Title I provides authority for proposed requirements that are consistent with the purposes of the Act and would support the Commission's statutory duties); *IP-Enabled Services*; *E911 Requirements for IP-Enabled Service Providers*, WC Docket Nos. 05-196 and 04-36, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245, 10261-64 ¶¶ 26-30 (2005).

[35] 47 U.S.C. § 151 (creating the FCC "for the purpose [inter alia] of promoting safety of life and property through the use of wire and radio communications").

[36] *Bounce-Back Order*, 28 FCC Rcd at 7600-05 ¶¶ 128-140.

offering identically for unrelated regulatory purposes. Instead, it connects each requirement to the regulated entity's role, the Commission's express public-safety responsibilities, and the technical and practical circumstances of the service.

C. Regulatory Consequences

Notably, neither the governing principles discussed in part II.A nor the sources of legal authority discussed in part II.B require that a decision about whether 911-related regulation is warranted have consequences in other areas of FCC regulation. Questions about how to categorize an offering for purposes of imposing 911-related obligations, and what such obligations to impose, can and should be de-coupled from other analyses.

A recent example is instructive. The Wireline Competition Bureau recently concluded that an offering by Tin Can Untechnologies, Inc., is not an "interconnected VoIP service" for purposes of the Commission's rules, including its 911-related rules.[37] APCO is gratified that Tin Can will be offering robust 911 capabilities to its customers.[38] We view this as an acknowledgement that consumers expect, and that the Commission and the public safety community are entitled to expect, that a service with Tin Can's characteristics will offer robust 911 capabilities. The analysis in the declaratory ruling, however, turned not on whether users would have an expectation of being able to reach emergency services by dialing 911 but on whether the service permits users to receive calls from and place calls to the public switched telephone network (PSTN).[39] That distinction, adopted over twenty years ago, does not reflect today's consumer expectations or today's technology. Tin Can's voluntary commitment demonstrates that compliance with the 911-related obligations of interconnected VoIP providers may be both expected and feasible even where a service arguably does not fall within the existing definition of interconnected VoIP.

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[37] *Far Homes, Inc. d/b/a Tin Can, Petition for Declaratory Ruling*, WC Docket No. 25-288, Declaratory Ruling, DA 26-1057 (Sept. 30, 2026) (*Tin Can Declaratory Ruling*).

[38] *See Tin Can Declaratory Ruling* at 4-5 ¶ 8.

[39] *Tin Can Declaratory Ruling* at 3-4 ¶ 6. Acting on delegated authority, the Wireline Competition Bureau was obligated to consider the petition under existing Commission precedents and guidelines. 47 CFR § 0.291(a)(2).

Tin Can's willingness to comply with 911 obligations despite opposing the interconnected VoIP classification suggests that linking 911-related decisions to other regulatory consequences can be harmful. The Commission need not maintain this mode of analysis.

D. Complete Priority Public Safety Proceedings

While we welcome the Commission's fresh look at its 911 regulatory framework, we urge the Commission not to delay action on public safety proceedings that are already under consideration, where Commission action could make a concrete difference. Such pending issues include 911 outage reporting requirements, NG911 interoperability, and other public safety matters that hold the promise of enhancing the 911 ecosystem or otherwise benefiting public safety, such as sidelink.

Improving outage notifications is one area in which Commission action could make a substantial difference for the 911 professionals working to save lives. When a network outage occurs that impacts the public's ability to reach 911, ECCs can take steps to mitigate the impact of the outage on the communities they serve if they have timely and actionable information about the outage. Unfortunately, service providers' compliance with the Commission's current outage reporting rules is not meeting those needs. Reporting thresholds as well as the content and formatting of outage reports need to be reconsidered,[40] and changes to the Commission's rules could make a substantial and concrete difference. One promising improvement would be for providers to facilitate the creation of visual, graphical outage information—similar to live outage maps posted by some utility providers—which could greatly improve ECCs' awareness of, and response to, outages.[41] Similarly, resolution of the NG911 interoperability proceeding is crucial because interoperability is essential to NG911's functionality, and further delay would increase the

[40] Comments of APCO International, PS Docket No. 15-80, PS Docket No. 13-75, ET Docket No. 04-35, at 3 (filed July 30, 2021).

[41] *See id.* at 5; Reply Comments of APCO International, PS Docket No. 15-80, PS Docket No. 13-75, ET Docket No. 04-35, at 4 (filed Aug. 30, 2021); Letter from APCO et al. to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket Nos. 15-80 and 13-75, ET Docket No. 04-35 (filed Jan. 7, 2025).

risk of entrenching incompatibilities.[42] Commission action could help drive industry to develop commonly accepted standards that achieve interoperability without interfering with ongoing technological improvements.[43]

Other matters pending with the Commission also deserve priority because of their potential to benefit public safety. For example, sidelink technology could support continuity of operations and coordinated response efforts when traditional networks are unavailable, strengthening public safety officials' ability to reliably respond to emergencies.[44] Action on such pending matters in the near term could make a concrete difference for public safety communications, and the Commission should not allow a broad inquiry to delay narrower proceedings in which the need for action is already established.

[42] Reply Comments of the Public Safety Next Generation 9-1-1 Coalition, PS Docket No. 21-479, PS Docket No. 13-75, at 8 (filed Sept. 17, 2025).

[43] In addition to the NENA i3 standard, we note that other standards bodies, including ATIS and 3GPP, develop standards relating to emergency calling. *See Location-Based Routing for Wireless 911 Calls*, Report and Order, 39 FCC Rcd 527, 535-36 ¶ 14 (2024). Of note, 3GPP TS 23.167 "defines the stage 2 service description for emergency services within the IP Multimedia Subsystem (IMS), including the elements necessary to support IP Multimedia (IM) emergency services and IM emergency services for eCall." *See TS 23.167 - IP Multimedia Subsystem (IMS) emergency sessions | 3GPP Explorer*, https://www.3gpp.org/dynareport/23167.htm.

[44] *See* Comments of APCO International, International Association of Chiefs of Police, International Association of Fire Chiefs, and National Sheriffs' Association, RM-12020, WT Docket No. 19-116, at 1 (May 7, 2026).

III. CONCLUSION

APCO and NSA appreciate the opportunity to comment on the Commission's 911 framework and urges that it be modernized in light of marketplace, technological, and legal developments. The Commission should also take action on pending matters that could make bring immediate and significant public safety benefits in the near term.

Respectfully submitted,

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