

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Ensuring the Reliability and Resiliency of the 988 Suicide & Crisis Lifeline)	PS Docket No. 23-5
)	
Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications)	PS Docket No. 15-80
)	
Implementation of the National Suicide Hotline Improvement Act of 2018)	WC Docket No. 18-336
)	

REPLY COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials (APCO) International, Inc.,¹ submits the following reply comments in response to the Notice of Proposed Rulemaking (NPRM) in the above-captioned proceeding.² APCO offers these reply comments to provide insight on how experience with 9-1-1 outage notifications might inform the 9-8-8 outage notification requirements and to support Emergency Communications Centers’ (ECCs’) choice to receive notification of 9-8-8 outages.

The Commission proposes to require covered 9-8-8 service providers to notify 9-8-8 special facilities about outages that potentially affect a 9-8-8 special facility and that such obligation should mirror the existing rules for 9-1-1 outage notifications.³ APCO defers to 9-8-8

¹ Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 39,000 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.

² Ensuring the Reliability and Resiliency of the 988 Suicide & Crisis Lifeline, Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications, Implementation of the National Suicide Hotline Improvement Act of 2018, PS Docket Nos. 23-5, 15-80, WC Docket No. 18-336, *Notice of Proposed Rulemaking*, FCC 23-7 (Jan. 27, 2023) (“NPRM”).

³ *Id.* at para. 20.

stakeholders regarding the useful triggers, content, and format of 9-8-8 outage notifications delivered to 9-8-8 special facilities. APCO notes, however, that it has suggested modifying the 9-1-1 outage notification rules to ensure ECCs receive timely and actionable information.

The existing 9-1-1 outage notification thresholds are too high, and ECCs frequently learn about an outage without receiving a notification. APCO has urged the Commission to lower the thresholds based on factors that are relevant to ECCs, such as the anticipated time to restore service, nature of the impact, and number of people and size of the area affected.⁴ Additionally, APCO has suggested that 9-1-1 outage notifications should include a visual representation of the outage, which would be more effective for enabling ECCs to quickly understand the scope of the impacted areas than text-only notifications.⁵ To address these issues for 9-1-1 outage notifications, the Commission directed the Public Safety and Homeland Security Bureau to gather information on the number of 9-1-1 outages that go unreported under the existing outage notification thresholds and to investigate the feasibility of including graphical information in outage notifications.⁶

Finally, the Commission seeks comment on whether ECCs should be notified about 9-8-8 outages.⁷ APCO supports an ECC notification requirement for ECCs electing to receive such notifications. An ECC's interest in receiving 9-8-8 outage notifications might depend on the

⁴ Comments of APCO International, PS Docket Nos. 15-80, 13-75, ET Docket No. 04-35, at 2-3 (filed July 30, 2021).

⁵ *Id.* at 4-5.

⁶ Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications, Improving 911 Reliability, New Part 4 of the Commission's Rules Concerning Disruptions to Communications, PS Docket Nos. 15-80, 13-75, ET Docket No. 04-35, *Second Report and Order*, FCC 22-88, at para. 23 n.86 (2022) ("We direct the Public Safety and Homeland Security Bureau to gather for future consideration information on the volume of 911 outages that may go unreported under the Commission's existing outage notification thresholds and seek additional comment on possible alternative outage reporting thresholds."); *Id.* at para. 15 ("We direct the Public Safety and Homeland Security Bureau to gather for future consideration additional information on 911 special facilities' capabilities to use graphical outage information, the utility of that information for 911 outage remediation, and the formats in which the graphic information would be feasible for service providers to produce.").

⁷ NPRM at para. 25.

extent to which a 9-8-8 outage results in increased calls to 9-1-1, the nature of the outage, and the ECC's procedures for interacting with 9-8-8 crisis centers. Some ECCs will be more likely than others to experience an influx of 9-1-1 calls during a 9-8-8 outage. Some 9-8-8 outages might impact the public's ability to call 9-8-8 but not an ECC's ability to transfer calls to a 9-8-8 crisis center. Some ECCs may want to know about a 9-8-8 outage to avoid referring callers to that line until the outage is resolved. For these reasons, and because ECCs will have differing policies on whether and when to transfer calls to 9-8-8, information about 9-8-8 outages will have differing impacts on ECCs' operational decisions. Accordingly, ECCs should be permitted to opt in to receiving 9-8-8 outage notifications.

Respectfully submitted,

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