Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities	)	GN Docket No. 13-111

REPLY COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials, International (APCO),[1] submits these reply comments in response to the Federal Communications Commission's Third Further Notice of Proposed Rulemaking on promoting the viability and deployment of technical solutions to combat contraband wireless devices in correctional facilities.[2] As the Commission notes, the use of contraband devices has been an ongoing problem in correctional facilities.[3] Recognizing the significant threat that contraband cell phones present to law enforcement and public safety, APCO supports the exploration of technical solutions, including the development of a regulatory framework to allow for the effective and safe deployment of cell signal jammers. In doing so, APCO supports the adoption of necessary technical safeguards and other appropriate parameters to protect authorized 9-1-1 calls and the use of public safety communications.

Cell signal jamming technologies must be deployed in a deliberate and thoughtful manner to avoid potential unintended consequences for public safety. By transmitting radio frequencies that block authorized wireless communications from connecting to a network, there is a risk of blocking lawful wireless calls to 9-1-1 from authorized personnel within the correctional facility, as well as from members

[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 45,000 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] *Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities*, GN Docket No. 13-111, Third Further Notice of Proposed Rulemaking, FCC 25-65 (2025).

[3] *Id*. at para. 1.

of the public who are near the facility. Historically, cell signal jammers have been imprecise, and their effects are difficult to contain. Cell signal jamming can therefore affect legitimate calls, including 9-1-1 calls, made from within the correctional facility by staff and correctional officers. In addition, because correctional facilities are often located near residences, businesses, roads, and other public areas, intentional signal interference can extend beyond correctional facility walls and disrupt lawful wireless communications by individuals or entities, potentially blocking 9-1-1 calls or delaying emergency assistance.

Cell signal jammers could also interfere with law enforcement and first responders' public safety communications. Public safety radios, such as those operating in the 700 and 800 MHz bands with both narrowband and broadband technologies, could experience interference from mechanisms used to block spectrally-nearby cellular signals. Public safety users could also experience interference when relying upon prioritized access to spectrum that is shared between public safety entities and commercial users. For these reasons, APCO recommends the Commission explore and adopt appropriate technical safeguards governing the use of cell signal jammers prior to their deployment. Cell signal jammers must not compromise public safety or access to emergency services. To ensure jamming technology can operate with sufficient precision and reliability, comprehensive testing (including under real-world conditions), operational safeguards, and careful, measured implementation is needed. Pilot programs, for example, can help evaluate the technologies' ability to prevent interference and identify what technical safeguards may be necessary.[4] APCO agrees with CTIA that, "[a] limited pilot trial could produce data regarding the extent to which jamming systems are able to avoid unintended spillover effects on lawful

[4] *See, e.g.*, Comments of CTIA — The Wireless Association at 27-28 ("CTIA Comments") (recommending that the Commission implement pilot programs as a "crucial first step" should it move forward with permitting jamming technology); Comments of Industry Council for Emergency Response Technologies, Inc. at 9 (agreeing that pilot programs would inform stakeholders of the "technical feasibility and challenges of jamming"); Comments of Competitive Carriers Association at 2 (recommending that at a minimum the Commission "require extensive testing and narrowly-tailored pilot programs"); Comments of AT&T Services Inc. at 16 (recommending that "[a]ny further action on jamming must be contingent on the successful completion of a pilot program in tightly controlled environments").

communications and under what circumstances," and that "[a]nalyzing the results of the trial would then help the Commission develop technical rules specifically tailored to jamming."[5] APCO also supports informational requirements, so that entities that choose to implement cell signal jammers fully understand how the technology operates and any constraints or considerations regarding its use. Jamming vendors should be required to provide clear and comprehensive disclosures about their technologies' capabilities and limitations, including to what extent, if any, its use may affect access to emergency communications. In this manner, entities can make informed decisions about whether to implement a specific jamming deployment based on their own unique needs and circumstances.

APCO appreciates the urgency and importance of addressing the danger posed by the use of contraband cell phones in correctional facilities and supports initiatives to ensure public safety officials have the necessary tools to combat them. The use of cell signal jammers would offer a powerful tool to combat contraband cell phones, provided they are deployed in a way that safeguards public safety

[5] CTIA Comments at 27-28.

communications, including calls to 9-1-1. APCO looks forward to continuing to work with all stakeholders on this important matter.

Respectfully submitted,

APCO INTERNATIONAL

By:

Mel Maier
CEO and Executive Director

Alison Venable
Government Relations Senior Counsel
(571) 312-4400 ext. 7004
venablea@apcointl.org

Dan Nahor
Government Relations Counsel
(571) 312-4400 ext. 7003
nahord@apcointl.org

January 12, 2026