Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Facilitating Implementation of Next Generation 911 Services (NG911)	)	PS Docket No. 21-479
	)	
	)	
Improving 911 Reliability	)	PS Docket No. 13-75

REPLY COMMENTS OF APCO INTERNATIONAL

Respectfully submitted,

APCO INTERNATIONAL

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I. INTRODUCTION AND EXECUTIVE SUMMARY

The Association of Public-Safety Communications Officials, International ("APCO")[1] provides these reply comments on the Federal Communications Commission's Further Notice of Proposed Rulemaking to ensure the resiliency, reliability, interoperability, and accessibility of Next Generation 9-1-1 (NG9-1-1) networks.[2] NG9-1-1 will fundamentally transform the scope and delivery of public safety services – more than an update or an upgrade, it is a reimagining of how emergency services operate. The establishment of baseline interoperability and reliability requirements for NG9-1-1, right from the start, is essential to ensuring that these networks can achieve their full lifechanging – and lifesaving – potential. At the same time, such rules must be sufficiently flexible to support nascent networks and technologies as they continue to evolve.

[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 40,000 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] *Facilitating Implementation of Next Generation 911 Services (NG911)*; *Improving 911 Reliability*, PS Docket Nos. 21-479 and 13-75, Further Notice of Proposed Rulemaking, FCC 25-21, 2025 WL 985736 (Mar. 28, 2025) ("*NG9-1-1 Further Notice*").

As described below, APCO urges the Commission to establish technology-neutral and forward-looking requirements that define covered 9-1-1 service providers based on their role in delivering and supporting 9-1-1 communications, with full accountability for the performance of subcontractors and third-party vendors. The Commission should adopt a definition of interoperability that ensures a shared understanding of the term, in a way that aligns with the established public safety consensus definition and needs. Any interoperability requirements should be supported by straightforward certification and testing to give public safety agencies confidence in the hardware and software they procure. Reliability requirements, including geographic diversity, network monitoring, and operational integrity, should likewise be integrated from the start. By establishing clear but flexible ground rules, the Commission can foster regulatory clarity and stability that will establish a foundation for NG9-1-1 deployment that prioritizes reliability and interoperability while encouraging innovation.

II. DISCUSSION

A. NG9-1-1 Rules Should Be Technology-Neutral and Forward-Looking

NG9-1-1 networks and services will present a transformational shift in how 9-1-1 calls are addressed. As the record reflects, NG9-1-1 offerings will extend well beyond existing 9-1-1 services and may include voice calls, Video Relay Service, Direct Video Calling, three-way video calling, two-way Real-Time Text, Automatic Automobile Crash Notifications, smart device fall detection, and more.[3] APCO therefore urges the Commission to set aside the concept of "functional equivalents" for the purpose of identifying covered 9-1-1 service providers

[3] *See* Comments of NENA: The 9-1-1 Association at 12 ("NENA Comments"); Comments of National Association of State 9-1-1 Administrators at 1-2 ("NASNA Comments"); *see generally* Comments of Accessibility and Research Organizations.

(CSPs), to the extent it means identifying one-for-one matches between existing 9-1-1 and future NG9-1-1 services. There is widespread support in the record for defining "covered 9-1-1 service provider" for purposes of NG9-1-1 in a flexible manner that accounts for evolving technology and avoids reliance upon an enumerated list of functional equivalents.

While APCO agrees with commenters who recommend looking at overall functionalities rather than functional equivalents,[4] APCO encourages the Commission to look beyond existing 9-1-1 functionalities (e.g., routing, delivery, and transfer of 9-1-1 calls) to encompass developing NG9-1-1 functionalities (e.g., delivery of video and other capabilities) for which there is no legacy equivalent.[5] Likewise, the Commission should not adopt a static definition that is tied to currently-existing commonly accepted standards that necessarily will evolve with time to keep up with technological advancement.[6] Defining CSPs by referencing existing standards would effectively create the kind of fixed list that commenters have asked the Commission to avoid,

[4] *See, e.g.,* Comments of Industry Council for Emergency Response Technologies at 7 (recommending the definition of CSP focus on whether a service enables the real-time routing, delivery, or transfer of 9-1-1 calls, or supports the real-time provisioning of a caller's location and call back information) ("iCERT Comments"); Comments of Comtech Telecommunications Corps at 12 (requesting a definition of CSP that is based on their functional/operational role, to maintain a technology-neutral approach) ("Comtech Comments"); Comments of USTelecom-The Broadband Association at 5-7 (urging the Commission to define CSPs according to their functional roles in the call flow rather than on specific services or technical components) ("USTelecom Comments").

[5] For this reason, APCO disagrees with NENA that the Public Safety and Homeland Security Bureau "maintain a list of covered elements" that requires continual updating for purposes of reporting requirements, even if such updating could be effectuated through a "lightweight" mechanism. *See* NENA Comments at 5.

[6] NENA has acknowledged, for example, that it has an upcoming release version of its i3 standard that "includes new [Functional Elements] that may be subject to reporting requirements." *See* NENA Comments at 4. NENA also references "the future concept of 'i3 Series' versioning" in its comments, noting that "[w]hile the specific schedule is to be determined, it will likely be every 2-3 years." *Id*. at 13.

unintentionally limiting consideration of NG9-1-1 deployment – which might be deployed in ways yet to be conceived – through today's lens.

APCO agrees that "[a] function-based framework would help ensure that all services materially affecting 911 calls" are covered, "without relying on static or incomplete categorizations," and that "the key inquiry should be whether a service failure would impede the real-time routing, delivery, or transfer of a 911 call, or the caller's location or callback information,"[7] but with two essential qualifiers: (1) "calls" should not be limited to voice but should also include video, text, and data;[8] and (2) the responsibility as a CSP should fall upon those entities with direct relationships with 9-1-1 authorities.[9] In this way, the Commission can remain technology-neutral, promote innovation, and account for future development of commonly accepted standards.

Consistent with established Commission precedent,[10] an entity that subcontracts individual functions in the 9-1-1 call flow out to different service providers or vendors must nevertheless retain responsibility for the acts of its subcontractors providing those functions. Where there is a service disruption in the NG9-1-1 context, 9-1-1 authorities (or the

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[7] Comtech Comments at 10.

[8] *Cf.* NASNA Comments at 1 (stating that "the rules should also account for emerging technology and components not yet identified," and thus "the term 'functional elements of the 911 call flow' should encompass technology beyond the term 'call.'").

[9] 9-1-1 authorities include individual ECCs. *See* NENA Comments at 3 (discussing that a 9-1-1 authority "is not necessarily the same entity as a PSAP, but it can be."). We note that many commenters agree that CSPs should have direct relationships with 9-1-1 authorities. *See, e.g.,* Comments of CTIA at 1; Comments of T-Mobile USA, Inc. at 2 ("T-Mobile Comments"); Comments of Alliance for Telecommunications Industry Solutions at 3 ("ATIS Comments"); Comments of Intrado Life & Safety, Inc. at 14 ("Intrado Comments") Comments of Hamilton Relay, Inc. at 2.

[10] *Improving 911 Reliability; Reliability and Continuity of Communications Networks, Including Broadband Technologies,* PS Docket Nos. 13-75, 11-60 Order on Reconsideration, 80 Fed. Reg. 60548, at para. 17 (2015) ("We emphasize, however, that the contracting out of certain functions, or the determination of a PSAP to contract with more than one entity for various aspects of 911 service, does not absolve individual entities of their respective obligations for reliable 911 service.").

Commission) should not bear the burden of identifying or managing the various vendors or subcontractors used by their contracted 9-1-1 service provider. Indeed, Comtech notes that with NG9-1-1, "service roles are often distributed across multiple entities, with rapidly evolving technologies and solutions."[11] Public safety agencies should be able to depend upon their contracted 9-1-1 service provider – the CSP, in the Commission's terms – taking full responsibility for overall performance and resolution of the issue. To hold otherwise would be unduly burdensome and unmanageable, creating confusion and dispersing accountability, ultimately diverting 9-1-1 authorities' critical and limited resources away from their core public safety missions.

B. The Commission Should Adopt Interoperability Requirements for NG9-1-1 Without Delay

Interoperability is a core component of NG9-1-1. In fact, there is no NG9-1-1 without interoperability. As the Commission defines it, NG9-1-1 is "an Internet Protocol-based system that…ensures interoperability" and "supports sharing information related to 911 requests for emergency assistance among emergency communications centers and emergency response providers."[12] 9-1-1 and industry commenters likewise recognize that interoperability is a critical component of NG9-1-1. Motorola Solutions Connectivity Inc., agrees that "interoperability is essential to a robust and effective NG911 system,"[13] and T-Mobile similarly notes that

[11] Comtech Comments at 12. In the context of potential reliability requirements, Comtech urges the Commission not to hold CSPs responsible for the actions of their vendors, stating that CSPs do not have operational control or visibility over these functions. *See id*. at 14. Comtech appears to suggest these subcontractors would now qualify as CSPs by stating that CSPs should be tied to functionality or components of NG9-1-1 service, "regardless of whether there is a direct contractual relationship with PSAPs." *Id*. at 14.

[12] 47 CFR § 9.28.

[13] Comments of Motorola Solutions Connectivity, Inc.at 2 ("Motorola Comments").

interoperability "is essential for the transition to and success of NG911."[14] Given that interoperability is integral to NG9-1-1, the Commission should adopt rules now to require it, as any delay would only embed incompatibilities and undermine the success of the nationwide transition.

1. The Time is Ripe to Address Interoperability

The Commission should reject claims that it is premature to address interoperability given the limited state of NG9-1-1 deployment nationwide. In fact, the nascent state of deployment makes this the ideal time to adopt interoperability and reliability requirements. These capabilities must be built into NG9-1-1 networks from the outset and not incorporated in piecemeal stages of deployment, which would delay the overall transition to NG9-1-1. True NG9-1-1 cannot be realized without interoperability and delaying action by not adopting rules, or deferring issues to a task force or stakeholder group, risks embedding incompatibilities into early deployments. Establishing requirements will give public safety agencies confidence that they can move forward with NG9-1-1 implementation and that the equipment and services they procure now will operate reliably and seamlessly across and within jurisdictions later. Interoperability challenges between existing ESInets and emergency communications centers (ECCs) already exist and will only be exacerbated as deployment expands. For example, one APCO member shared that interstate interoperability remains a major hurdle because their statewide ESInet cannot share critical information with a neighboring state. Their challenge arises from the fact that, despite the significant efforts made by state and local 9-1-1 officials to implement IP-based networks, the two states operate different ESInet architectures and bridging the systems would

[14] T-Mobile Comments at 4.

require technical modifications that are prohibitively expensive. Without baseline rules, these situations will continue to occur and public safety agencies will face the costly and complex task of correcting these gaps after the fact.

2. The Commission Must Establish a Baseline Understanding of Interoperability

The record underscores the need for the Commission to promote a common understanding of what interoperability means. Throughout the record, commenters variously describe interoperability as interconnection between ESInets or ECCs, interconnection among all elements of NG9-1-1 networks, or simply conformance with specific standards.[15] These descriptions fall short of what true interoperability requires. For the public safety community, interoperability is straightforward: the ability to exchange all forms of 9-1-1 traffic without the need for costly, after-the-fact proprietary interfaces, and regardless of jurisdiction, vendors, and equipment used. As we stated in our initial comments, APCO urges the Commission to adopt public safety's consensus definition for interoperability.[16] No other commenters proposed an alternative definition. Several commenters, however, described interoperability in a manner that

[15] *See, e.g.,* Comments of South Carolina Coastal Area Cooperative at 1 (describing interoperability among Cooperative partners in South Carolina simply as the ability to provide 9-1-1 call answering and dispatching services across state lines); iCERT Comments at 17 (explaining that "interoperability considerations must [] encompass network connectivity, routing, and location data capabilities."); Comments of NENA at 9 (explaining that "[i]nteroperability has three aspects that should be part of the rules: OSP to NGCS, NGCS to PSAP and NGCS to NGCS. NGCS to NGCS interoperability would describe how two different ESInet providers transfer calls between each other.").

[16] *See* Comments of APCO International at 3 (requesting the Commission define interoperability to mean "the capability of emergency communications centers to receive 9-1-1 requests for emergency assistance and information and data related to such requests, such as location information and call back numbers from a person initiating the request, then process and share the 9-1-1 requests for emergency assistance and information and data related to such requests with other emergency communications centers and emergency response providers without the need for proprietary interfaces and regardless of jurisdiction, equipment, device, software, service provider, or other relevant factors").

aligns with APCO's proposed definition.[17] Clearly defining interoperability from the outset will reduce confusion and compliance challenges for service providers and ensure that public safety entities receive the reliable and seamless interoperability they need.

Interoperability is not the same as interconnection. There can be interconnection without interoperability.[18] While interconnection links systems together, interoperability ensures that all NG9-1-1 functions, services, and data types work seamlessly across them, regardless of jurisdiction, vendor, or equipment. Similarly, interoperability goes beyond merely conforming to a set of standards. The use of specific standards might assist in facilitating interoperability, but it does not guarantee that interoperability will actually be achieved. As commenters point out, standards can be implemented in various ways by different service providers.[19] Therefore, adopting a set of standards does not, by itself, mean an NG9-1-1 network is interoperable.

Consumers rely on interoperable communications every day, and public safety should enjoy the same seamless connectivity. Further, ensuring NG9-1-1 leverages, whenever possible, the same commonly accepted standards, protocols, processes, and capabilities that are enjoyed by commercial users, is critical to the NG9-1-1 evolution. Establishing a baseline understanding

[17] *See* NENA Comments at 8 (noting that "[i]nteroperability is more than PSAPs being connected by a common NGCS provider"); Comments of Colorado Public Utilities Commission at 8 (describing interoperability use cases as "the ability to transfer 911 from one PSAP to a neighboring PSAP even if those PSAPs are served by different ESInet providers") ("Colorado PUC Comments"); T-Mobile Comments at 7 ("NG9-1-1 systems should be capable of receiving, interpreting, and transmitting incident-related data provided by originating networks, including caller location. . .[t]his level of interoperability enables actionable, real-time information to flow efficiently from caller to call taker to first responder, regardless of jurisdictional boundaries or vendor systems.").

[18] Interconnection is at the physical layer and makes no promises of the solutions being compatible and interoperability is at the application/service level ensuring that functionalities are met across networks and platforms.

[19] Motorola Comments at 5 (noting that compliance with commonly accepted standards, including i3, "involves certain judgement calls by a CSP that makes it ill-suited for conducting 'conformance testing' of NG911 devices and network equipment."). Bandwidth Comments at 13 (describing the challenges with interconnection between ESInets stemming from different vendor interpretations of commonly accepted standards).

of what is and is not interoperability will ensure that any rules regarding testing and certification requirements are born from a common understanding and align with the expectations of the public safety community.

3. The Commission's Rules Should Include Interstate and Intrastate Interoperability

In an NG9-1-1 environment, calls and associated data can, and often must, cross state boundaries. The artificial division between "interstate" and "intrastate" interoperability has no practical basis in the NG9-1-1 ecosystem and should not be used to limit the scope of the Commission's requirements. Comments in the record offer support for the Commission to address intrastate interoperability in addition to interstate. For example, the Texas 9-1-1 Entities "recognize the importance of interoperability between ESInets on an intrastate basis,"[20] and NENA calls on the Commission to "invoke authority in all cases that CSPs need to provide interoperable connections between different jurisdictions, including intrastate use cases."[21] The Commission has long recognized its jurisdiction to regulate both interstate and intrastate aspects of communications where it is impossible or impractical to separate the two, and that principle applies squarely here given the inherently interconnected and borderless nature of NG9-1-1

[20] Texas 9-1-1 Entities at 4.

[21] NENA Comments at 8.

traffic.[22] As the Commission notes, the proposed requirements in the *NG9-1-1 Further Notice* are not intended to "alter state jurisdiction over 911 or directly affect intrastate facilities."[23]

C. Interoperability Certifications and Testing Will Provide Assurances Public Safety Equipment is Interoperable

Public safety agencies need adequate assurances that the equipment they purchase complies with Commission interoperability requirements. APCO therefore urges the Commission to require CSPs to certify that: (1) their equipment, devices, and connected solutions associated with the deployment of an NG9-1-1 network are interoperable (as defined above); and (2) such interoperability has been validated through interoperability testing. In this way, public safety agencies can invest in NG9-1-1 equipment and devices with confidence, knowing these products have gone through a testing process to ensure they will perform reliably during an emergency. The time for real-world testing of NG9-1-1 equipment is before it is deployed. Discovering that equipment is not truly interoperable during a 9-1-1 crisis could result in disastrous consequences for safety of life and property, including dropped 9-1-1 calls and delayed emergency response.

Interoperability testing need not be burdensome: the Commission could afford CSPs flexibility in how they demonstrate compliance, thus encouraging innovation while still ensuring accountability. The Commission could strike an appropriate balance by allowing CSPs to self-certify that their hardware and software are interoperable, consistent with a clear definition of

[22] Congress has given the Commission broad authority to ensure that the 9-1-1 system is available and functions effectively. 47 CFR §§ 151-152, 251(e)(3), 615 (establishing the Commission, in part, "for the purpose of promoting safety of life and property through the use of wire and radio communication" and endorsing a role for the Commission in the nationwide implementation of advanced 9-1-1 capabilities).

[23] *NG9-1-1 Further Notice* at para. 118.

interoperability (as discussed above) and validated through real-world testing.[24] This approach appropriately places the responsibility of establishing interoperability on the service providers, consistent with the Commission's approach in the *NG9-1-1 Transition Order* to place the costs and responsibility for delivering 9-1-1 traffic in IP-based format on the service providers, including any necessary testing.[25]

APCO disagrees with those who suggest that interoperability testing cannot yet take place due to inadequate testing mechanisms.[26] Interoperability testing need not wait for the establishment of a third-party, independent testing authority acting "in a more official capacity," as NASNA suggests.[27] Some parties simply may choose to conduct necessary testing in-house. Further, as a practical matter and as explained above, it is too late to wait to test a product until after it already has been purchased and deployed.

While APCO continues to recognize the importance of conformance testing, APCO agrees with NENA that "[i]t's more practical to verify interoperability directly than it is to verify it indirectly through conformance testing."[28] Further, relying solely on conformance testing risks limiting NG9-1-1 solutions to a narrow set of prescribed commonly accepted standards unless it is structured to support, and actively encourage, testing across multiple commonly accepted

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[24] We suggested required parameters for interoperability testing in our initial filing. *See* APCO Comments at 5 (suggesting that interoperability testing "follow the 'rule of three' by demonstrating that a product or solution is interoperable with at least three ECCs, utilizing three different ESInets" and recommending a sample test scenario). We further recommend aligning interoperability certifications with the Standard Declaration of Compliance documents required in the Project 25 Compliance Assessment Program, as discussed in our initial filing. *See id*. at 5 n.12.

[25] *NG9-1-1 Transition Order* at para. 145.

[26] NASNA Comments at 8 (suggesting that interoperability testing is "still in the development process" and "there is no recognized independent testing entity established").

[27] *Id*.

[28] NENA Comments at 6.

standards. For these reasons, APCO is persuaded that it is unnecessary for the Commission to mandate conformance testing requirements. While conformance testing may be a tool leveraged to help initially establish interoperability, end-to-end interoperability testing is necessary and should be required to demonstrate how software and hardware will be interoperable in practice.

Finally, the record supports giving public safety agencies access to interoperability and reliability certifications.[29] A simple format, such as providing interoperability testing results in a pass/fail manner, would have the benefit of providing necessary information to public safety agencies while addressing service provider concerns about disclosing detailed network information.[30]

D. The Commission Should Adopt Reliability Requirements for NG9-1-1 Networks

APCO continues to support the Commission's proposal that CSPs implement practices addressing physical diversity, network monitoring, and operational integrity, and strongly agrees that geographic diversity must be incorporated into the definition of physical diversity to ensure true resiliency.[31] In addition, APCO agrees with Intrado that "cybersecurity is a critical component of NG911 reliability" and would support the Commission's consideration of cybersecurity measures as part of the reliability requirements.[32] Just as interoperability requirements are fundamental to NG9-1-1, reliability measures must be built into these systems from the outset. Accordingly, APCO disagrees with commenters who assert it is premature to

[29] Colorado PUC Comments at 11-12; Comments of Michigan State 9-1-1 Committee at 1; NASNA Comments at 6; Comments of Colorado Council of Authorities at 3; Comments of Lumen at 13.

[30] *See e.g.* Intrado Comments at 22.

[31] Colorado PUC Comments at 10; NASNA Comments at 6-7; NENA Comments at 20.

[32] Intrado Comments at 6.

adopt reliability measures for NG9-1-1.[33] APCO also rejects the notion that a CSP's reliability responsibilities should be limited to areas within its direct control.[34] As discussed above, CSPs must be accountable for the actions of their third-party contractors, including the measures those parties take to maintain reliability.

E. The Commission Should Address NG9-1-1 Outage Reporting in a Separate, Dedicated Proceeding

While it is essential that the Commission and ECCs have situational awareness about outages that potentially affect NG9-1-1 services, just as they do with 9-1-1 services, outage reporting requirements warrant a more in-depth review beyond the scope of the current *NG9-1-1 Further Notice* proceeding. For this reason, APCO urges the Commission to address this matter more fully and holistically in a separate proceeding, taking into consideration past filings that have already been submitted in the record. Notably, APCO, together with NENA and NASNA, have previously asked the Commission to revise existing 9-1-1 outage notification requirements to ensure that ECCs receive relevant information that can be easily and quickly reviewed and acted upon.[35] In addition, among other things, APCO, NASNA, and NENA have asked for the completion of the Bureau's analysis regarding the number of 9-1-1 outages that go unreported under the existing outage notification thresholds.[36] This information will help inform any

[33] Intrado Comments at 3; Lumen Comments at 2; Bandwidth Comments at 2; USTelecom Comments at 2.

[34] iCERT Comments at 13.

[35] *See* Letter from Mel Maier, CEO and Executive Director, APCO International, Harriet Rennie-Brown, Executive Director, NASNA, Brian Fontes, CEO, NENA, to Marlene H. Dortch, Secretary, FCC, PS Docket Nos. 15-80, 13-75, ET Docket No. 04-35 (filed Jan. 6, 2025).

[36] *Id*. at 3; *see also Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications, Improving 911 Reliability, New Part 4 of Commission's Rules Concerning Disruptions to Communications*, PS Docket Nos. 15-80 and 13-75, ET Docket No. 04-35, Second Report and Order, 37 FCC Rcd 13847, 13860, para. 23 n.86 ("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.").

necessary refinements to the Commission's 9-1-1 – and ultimately NG9-1-1 – reporting requirements.

A number of commenters likewise request that the Commission address outage reporting in a separate proceeding.[37] For example, CTIA observes, "[m]odifying the Commission's outage reporting rules piece-by-piece, rather than evaluating these rules holistically, would risk creating inconsistencies, confusing [originating service providers], CSPs, and public safety, and setting policy or metrics that unnecessarily diverge from those adopted in other outage contexts."[38] APCO agrees,[39] and accordingly requests that 9-1-1 and NG9-1-1 outage notification requirements be promptly considered in a separate, dedicated proceeding.

III. CONCLUSION

The Commission has a pivotal opportunity to shape the foundation of NG9-1-1 in a way that ensures seamless, reliable, and future-proof emergency communications. By adopting rules that establish clear accountability, require reliability and interoperability, and ensure transparency through straightforward certifications, the Commission will not only address today's challenges but also prevent fragmentation and vulnerabilities as NG9-1-1 evolves.

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[37] *See, e.g.,* NENA Comments at 25 ("While NENA agrees that outage reporting requirements should be revisited, particularly in light of the considerations NENA raised in its filing earlier this year, we encourage the Commission to address outage reporting for 9-1-1 and NG9-1-1 in a holistic manner in a separate proceeding. It would be beneficial to encompass these interconnected, complex issues within a single proceeding for ease of discussion."); Comtech Comments at 20 ("Comtech recommends that the Commission open a dedicated proceeding focused on outage notification and coordination in NG911 environments.").

[38] CTIA Comments at 5.

[39] Some commenters, in addition to requesting that outage reporting be addressed in a separate proceeding, address the *NG9-1-1 Further Notice's* outage reporting proposals more substantively. We do not address the substance of these filings, in terms of the merits of the *NG9-1-1 Further Notice's* proposals, but indicate our concurrence with respect to their process recommendation that these matters be teed up in a separate proceeding. *See, e.g*., iCERT Comments at 17-18 (requesting that outage reporting be addressed in a separate proceeding, but also suggesting the *NG9-1-1 Further Notice's* proposed approach to outage reporting could result in an overwhelming number of notifications).

Setting these expectations now will drive innovation in the right direction, foster trust among public safety agencies, and guarantee that when people call 9-1-1, no matter the technology or jurisdictional boundary, help will arrive without delay.

Respectfully submitted,

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