

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

In the Matter of)	
)	
Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications)	PS Docket No. 15-80
)	
Improving 911 Reliability)	PS Docket No. 13-75
)	
New Part 4 of the Commission’s Rules Concerning Disruptions to Communications)	ET Docket No. 04-35
)	

REPLY COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials-International, Inc. (APCO),¹ offers the following reply comments in response to the Notice of Proposed Rulemaking in the above-captioned proceeding.² APCO offers these reply comments to highlight the importance of deferring to emergency communications centers’ (ECCs’) preferences of the outage information they receive, the public safety benefits of graphical outage information, and the responsibility of service providers to establish a two-way contact information database.

I. ECCs Are Best-Suited to Determine What They Need to Mitigate Network Disruptions that Impact 9-1-1.

Several representatives of service providers argue for limiting the outage information provided to ECCs on the basis that they believe ECCs will be overwhelmed, overburdened,

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 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.

²Amendments 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, *Third Notice of Proposed Rulemaking*, FCC 21-45 (April 23, 2021).

and/or confused by the frequency, content, and format of outage notifications.³ For example, NCTA and Verizon challenge the proposal that originating service providers be required to provide outage notifications to ECCs via phone and electronic means (absent an alternative agreement with ECCs), arguing that this will burden ECCs⁴ and make it more difficult to identify important information.⁵ As APCO stated in its initial comments, dual forms of notifications are an important option because outages impacting 9-1-1 may coincide with outages impacting phone and email communications with ECCs.⁶ ECCs are best suited to determine what format would provide the most efficient outage notifications (and ideally would be able to indicate their preferences in a two-way contact information database established and maintained by the service providers).

Verizon further expresses concern that requiring follow-up notifications from originating service providers within two hours risks “PSAP fatigue,” and suggests that such supplemental notifications are unnecessary when ECCs could instead request updates using the contact information for the service provider included in the initial notification.⁷ However, it should not be the responsibility of the ECC dealing with the outage to check in with the service providers and ask whether new information is available, or if the original notification ended up being

³ See Comments of CTIA at 5. (“[T]he transmission of multiple outage reports in different formats, by telephone and in writing via electronic means, could potentially overburden PSAP personnel.”); Comments of T-Mobile at 2 (“Any expansion of notices to PSAPs beyond 911 Outages should be carefully considered so as not to create an overwhelming burden on PSAPs.”); Comments of NCTA at 3 (stating that as a result of the proposed rules requiring originating service providers to provide notification no later than 30 minutes after an outage is discovered “providers likely will over-report and PSAPs may be inundated with confusing notifications that may not affect their operations.”); Comments of USTelecom at 6 (“Requiring automated notifications, as the Notice seeks comment on, exacerbates the potential for PSAPs to be overwhelmed or confused”). See also, Comments of USTelecom at 5. (“[I]nformation on the ‘best known cause of an outage’ may be very technical and therefore not relevant to the PSAP’s relevant situational awareness, and it may change as more outage details are investigated and become known.”).

⁴ Comments of Verizon at 13.

⁵ Comments of NCTA at 4-5.

⁶ Comments of APCO at 4.

⁷ Comments of Verizon at 12.

incorrect or incomplete. Additionally, APCO is unaware of ECC “fatigue” concerns related to notifications via phone and electronic means or supplemental notifications currently required for covered 9-1-1 service providers. Extending these obligations to originating service providers is appropriate.

In some cases, industry commenters contradict the consensus recommendations developed by the Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC). For example, USTelecom challenges the inclusion of the “best known cause of an outage” as material information to be included in outage notifications on the basis that ECCs would not utilize this information.⁸ Again, ECCs are in the best position to determine what information is useful. The NRSC developed the template in conjunction with APCO, NENA, and NASNA, and found that “[the] information on apparent cause, if known, can provide guidance to the PSAP and/or 9-1-1 Authority.”⁹

Fundamentally, to ensure the information provided to ECCs best serves ECCs’ needs, the Commission should defer to the perspectives provided by the public safety community. ECCs know what information they need to protect the public. Rather than offering opinions on what information ECCs would find most actionable, the service providers should share data and analyses on outages they’ve experienced. As APCO’s comments noted, a detailed analysis from the service providers is needed to shed light on important factors such as the scope of unreported outages, service providers’ ability to accurately estimate restoration times, and how the timing of information availability might vary by the nature of the outage.¹⁰ This will be helpful for

⁸ Comments of USTelecom at 5.

⁹ Alliance for Telecommunications Industry Solutions (ATIS) Network Reliability Steering Committee (NRSC) Situational Awareness for 9-1-1 Outages Task Force Subcommittee (NRSC Task Force), *Service Providers: Outage Reporting Structure and Potential Types of Outages* at 3 (2018) available at https://access.atis.org/apps/group_public/download.php/44352/ATIS-0100066.zip.

¹⁰ Comments of APCO at 3.

determining the situations in which it makes sense for a notification to be made and how much time should be permitted for verification and gathering additional information.

II. Graphical Outage Information Will Substantially Enhance Public Safety.

In initial comments, several service providers indicated opposition to providing graphical interface data or direct access to internal outage monitoring systems, citing inconvenience and confidentiality concerns.¹¹ Graphical information about outages can likely be shared in a way that reduces confidentiality concerns and the effort required to provide this information to ECCs. Regardless, these concerns should not outweigh the value of this information to protecting lives and property. Graphical information will significantly enhance ECCs' ability to quickly understand the scope of an outage and take steps to mitigate the impact.

III. Service Providers Should be Responsible for Establishing a Two-Way Contact Database.

Several commenters suggested that the responsibility for establishing a contact information database should be placed on the public safety community or the Commission.¹² As APCO stated in its initial comments, establishing a secure, two-way contact database is the responsibility of the service providers. Shifting this responsibility to the public safety community or Commission would set a bad precedent and likely delay the implementation of this important resource. Service providers are in a superior position to establish and maintain the database.

¹¹ See comments of Verizon at 12 (Opposing inclusion of graphical interface data on the grounds that such data would involve extremely burdensome IT changes, require integration of secure internal proprietary mapping and network monitoring systems with the provider's and the PSAP's own reporting systems, risk the disclosure of proprietary and security-sensitive network information, and deliver PSAPs a firehose of information unnecessary for their near-term situational awareness); Comments of Lumen at 4 ("Lumen opposes expanding notification content to GIS or mapping data, as Lumen does not have this type of information available on the expedited timeframe applicable to notifications."); Comments of USTelecom at 6-7 ("[A]utomated notifications require intelligence to map the impacts for all outages to the specific PSAPs that may be impacted and substantial reengineering of alarm and monitoring systems, which may only be technologically feasible for the nation's largest providers, if at all, and not the thousands of service providers the Commission estimates will be affected by its proposals.")

¹² See Comments of AT&T at 12; Comments of CTIA at 8.

They possess the necessary resources, are required under Commission rules to notify ECCs of outages, and (in some cases pursuant to consent decrees)¹³ already maintain separate contact databases tailored for communicating about 9-1-1 outages.¹⁴ Thus, the Commission should require service providers to establish and maintain the database for the benefit of public safety.

Respectfully submitted,

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¹³ See Standard Operating Procedures (SOP) for Updating Public Safety Answering Point (PSAP) Outage Contact Information, Alliance for Telecommunications Industry Solutions, at 3 n.8 (nov. 21, 2019), available at [https://access.atis.org/apps/group_public/download.php/50322/ATIS_0100068\(2019-11\).pdf](https://access.atis.org/apps/group_public/download.php/50322/ATIS_0100068(2019-11).pdf).

¹⁴ See, e.g., Comments of T-Mobile at 4 (“T-Mobile has enabled real time updates to its PSAP contact database, created a mailbox for tracking communications during the Company’s contact verification process, and added data logic checks to ensure that all PSAP phone numbers and email addresses are in valid formats.”).