

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

In the Matter of	)	
	)	
Improving 9-1-1 Reliability	)	PS Docket No. 13-75
	)	
Reliability and Continuity of Communications	)	PS Docket No. 11-60
Networks, Including Broadband Technologies	)	

**COMMENTS OF APCO INTERNATIONAL**

The Association of Public-Safety Communications Officials-International, Inc. (APCO)<sup>1</sup> submits these comments in response to the Public Safety and Homeland Security Bureau’s public notice seeking comment on a national 9-1-1 call center contact information database.<sup>2</sup> APCO submits these comments to urge the Commission to require service providers to establish and maintain a secure, two-way contact information database. APCO has long advocated for the creation of such a database, but would not support a process that shifts costs to the public safety community and absolves service providers of responsibility.

As an initial matter, the need for a two-way contact database should be evaluated in the broader context of improving situational awareness and emergency communications during network outages or degradations that could impact communications with ECCs. ECCs need to have timely information about the scope, nature, and anticipated duration of outages in order to take steps to protect their communities. The Commission should consider regulatory changes that would make outage notifications timelier and more actionable. For example, outage information

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<sup>1</sup> 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.

<sup>2</sup> Public Safety and Homeland Security Bureau Seeks Comment on a National 911 Call Center Contact Information Database, PS Docket Nos. 13-75, 11-60, *Public Notice*, 35 FCC Rcd 14686 (2020).

could be provided directly from service providers' internal monitoring systems and in an easily accessible format similar to the maps used to track some electric utility outages. Improving the format and timeliness of notifications will complement the development of a national two-way contact database.

A two-way contact database maintained by the service providers would improve emergency preparedness and response. When an outage occurs that impacts the ability of the public to reach 9-1-1, service providers should immediately contact the impacted ECCs. And because ECCs often detect outages before being notified by a service provider, they need to know how to contact the relevant service provider. In addition to the operational benefits, a single database would reduce costs for service providers and spare ECCs the burden of responding to individual requests from service providers multiple times a year.<sup>3</sup> Given that service providers possess vastly superior resources, already maintain their own databases for contacting ECCs (in some cases pursuant to consent decrees with the Commission),<sup>4</sup> and have regulatory obligations to notify ECCs of certain major outages,<sup>5</sup> they are well-suited to establish and maintain a single national database. Furthermore, in 2016, the Commission opted to forego additional resiliency regulations in light of the service providers' commitment to enhance coordination and information sharing by, among other things, "establishing a provider/PSAP

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<sup>3</sup> See Standard Operating Procedures (SOP) for Updating Public Safety Answering Point (PSAP) Outage Contact Information, Alliance for Telecommunications Industry Solutions, 1 (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) ("Due to the continued lack of a common database containing contact information for both carriers and PSAPs, Service Providers that maintain PSAP databases may request information from PSAPs individually, multiple times a year by telephone and electronic means.").

<sup>4</sup> See *id.* at 3 n.8.

<sup>5</sup> 47 C.F.R. § 4.9(e)(1)(v).

contact database.”<sup>6</sup> The Commission should not permit service providers to transfer this responsibility or any associated costs to the public safety community.

The national database created and maintained by service providers must be reliable and secure. In its letter, ATIS signaled that service providers are concerned that, “if a provider were to fail to appropriately contact a PSAP because of inaccurate or out-of-date contact information in the database, the provider could be found in violation of the Commission’s Part 4 rules.”<sup>7</sup> To address this concern ATIS suggests the Commission adopt a safe harbor to absolve service providers of liability for any violation of the Commission’s rules stemming from the provider’s reliance on information in the database.<sup>8</sup> APCO does not support creating a safe harbor for reliance on “any national PSAP database.”<sup>9</sup> Such a policy would be overly-broad. Instead, service providers’ liability concerns would be more appropriately addressed if they established measures to ensure the accuracy of the database that are at least as stringent as the measures they have deemed necessary for their own databases.

Finally, a national database of this sort will contain sensitive information. Accordingly, the database must be secure and confidential, and users of the database should not be permitted to monetize the information or use it for purposes other than the operational purpose it is designed for.

Respectfully submitted,

APCO INTERNATIONAL

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<sup>6</sup> Improving the Resiliency of Mobile Wireless Communications Networks; Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket Nos. 13-239, 11-60, *Order*, 31 FCC Rcd 13745, para. 5 (2016). *See also id.* at para. 23 (“Because the voluntary Framework submitted by the major wireless providers presents a more appropriate solution to improving wireless resiliency and enabling provider transparency, we decline to adopt the rules proposed in the *Notice*, and terminate PS Docket No. 13-239.”).

<sup>7</sup> *See* Letter from Thomas Goode, General Counsel, ATIS, to Marlene Dortch, Secretary, FCC, PS Docket Nos. 11-60, 13-75, 2 (filed Dec. 7, 2020).

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

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