

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

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

COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials-International, Inc. (APCO),¹ submits these comments in response to the Wireless Telecommunications Bureau’s Public Notice inviting parties to refresh the record in the above-captioned proceeding.² The Public Notice seeks comment on potential solutions to address the use of contraband wireless devices by inmates in correctional facilities.³ As the Bureau considers a range of technological solutions to this issue, it must recognize the unique threats to public safety inherent in introducing cellular signal jamming technology or its equivalent.⁴ If the threats to public safety communications and access to 9-1-1 are ignored, the Bureau risks replacing one public safety problem with another.

While the intent of jamming (or effectively jamming) cell signals may be to block only the illicit signals within the correctional facility, these mechanisms are indiscriminate, and thus can block legitimate signals as well. For example, cell signal jammers placed within a correctional facility could block a legitimate call to 9-1-1, whether the call was made from inside or simply

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.

² Wireless Telecommunications Bureau Seeks to Refresh the Record on Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities, GN Docket No. 13-111, *Public Notice*, DA 20-791 (rel. July 28, 2020) (“Notice”).

³ *Id.* at 1.

⁴ *Id.* at 6-7.

near the correctional facility. This interference would place the 9-1-1 caller in danger by preventing or significantly delaying emergency response. The Bureau has acknowledged the “overriding importance of ensuring availability of emergency 9-1-1 calls from correctional facilities.”⁵ Any approach to dealing with contraband devices must not prevent legitimate 9-1-1 calls.

Cell signal jammers can also block or interfere with the wireless communications of first responders, and using base stations to effectively jam cellular signals could have a similar impact. Public safety radios such as those operating in the 700 and 800 MHz bands are susceptible to interference from mechanisms used to block spectrally-nearby cellular signals. Interference could also occur where public safety users are relying on prioritized access to spectrum that is shared between public safety entities and commercial users, as is the case with FirstNet’s nationwide public safety broadband network. It’s unclear how jamming technology would distinguish between legitimate and illegitimate use. Disruptions in first responders’ voice or data traffic could place them at risk.

Finally, even if inadvertent interference with public safety communications could be prevented, making jamming technology more readily available in the stream of commerce could make it extremely difficult to prevent misuse. Stringent measures would need to be in place to prevent unauthorized access and use of these devices.

Respectfully submitted,

APCO INTERNATIONAL

⁵ In the Matter of Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities, GN Docket No. 13-111, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 17-25, para. 44 (rel. Mar. 24, 2017).

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