

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

In the Matter of)
)
Implementation of the National Suicide Hotline) WC Docket No. 18-336
Improvement Act of 2018)

COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials-International, Inc. (APCO),¹ submits these comments in response to the Wireline Competition Bureau’s Public Notice inviting parties to comment on the costs and feasibility of providing location information for 9-8-8 calls in the above-captioned proceeding.² The Public Notice seeks comment on the “feasibility and cost of including an automatic dispatchable location that would be conveyed with a 9-8-8 call, regardless of the technological platform used and including with calls from multi-line telephone systems.”³ Because some calls to 9-8-8 will require an emergency response, the crisis center may need to contact or transfer a call to an appropriate 9-1-1 emergency communications center (ECC). APCO offers these brief comments from a public safety perspective on the value and feasibility of delivering dispatchable location information when a crisis center needs to communicate with an ECC.

Incidents involving suicidal callers, who may be unable or unwilling to report their location, illustrate the importance of accurate, actionable location information. When a crisis

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 Wireline Competition Bureau Invites Comment on Costs and Feasibility of Providing Location Information for 988 Calls and Clarifies the 988 Implementation Date, WC Docket No. 18-336, *Public Notice*, DA 20-1378 (rel. Nov. 19, 2020) (“Notice”).

³ *Id.* at 1.

center must contact an ECC for an emergency response, having accurate location information will enable identification of the appropriate ECC and potentially provide that ECC with actionable location information about the caller. This will decrease the likelihood that time will be wasted if the first ECC contacted is not the appropriate one and would need to transfer the call to a different ECC. This will also improve response capabilities. When an emergency response is necessary, dispatchable location is the gold standard for public safety. With the street address, apartment number, or other necessary information provided as part of a dispatchable location, 9-1-1 professionals will be able to get EMTs and other appropriate responders to the caller as quickly as possible. The reduction in response time that comes from having accurate location information for identifying the appropriate ECC and getting first responders to the caller has a direct impact on the number of lives that can be saved.⁴

Providing dispatchable location information is technically feasible. APCO has urged the Commission to create incentives for service providers to leverage a variety of technologies to deliver the best possible location information to support emergency response.⁵ The Commission began requiring dispatchable location with 9-1-1 calls from certain technological platforms, beginning in February 2020.⁶ As the Commission has recognized, dispatchable location is already being provided for some wireless 9-1-1 calls, which present the most technically

⁴ See Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, *Fourth Report and Order*, FCC 15-9 at para. 160 (rel. Feb. 3, 2015) (estimating that more than 10,000 lives a year could be saved by improving the location information conveyed with 9-1-1 calls); see also Mark Reddish, *New Progress for Getting Wireless 9-1-1 Calls to the Right ECC*, APCO International (Sept. 26, 2019) (examining the number of lives that could be saved by delivering wireless 9-1-1 calls to the appropriate ECC without the need to transfer the call) <https://www.apcointl.org/new-progress-for-getting-wireless-9-1-1-calls-to-the-right-ecc/>.

⁵ See Comments of APCO International, *In the Matter of Implementing Kari's Law and Section 506 of RAY BAUM'S Act*, PS Docket Nos. 18-261, 17-239 (Dec. 10, 2018); see also Comments of APCO International, *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114 (Feb. 21, 2019).

⁶ In the Matter of Implementing Kari's Law and Section 506 of RAY BAUM'S Act, PS Docket Nos. 18-261, 17-239, GN Docket No. 11-117, *Report and Order*, FCC 19-76 at para. 137 (rel. Aug. 2, 2019) (mandating dispatchable location requirements for calls to 9-1-1 from interconnected VoIP service, Telecommunications Relay Services, fixed telephony, mobile text, and Multi-Line Telephone Systems).

challenging situation for identifying a caller's location and likely will comprise the vast majority of calls to 9-8-8.⁷ Further, as technology evolves, dispatchable location will be increasingly available, in some cases as part of the location information provided by a caller's device without additional cost.⁸

Respectfully submitted,

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⁷ Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, *Sixth Report and Order and Order on Reconsideration*, FCC 20-98, at para. 51 (rel. July 17, 2020) (“Dispatchable location is already being provided for some number of 911 calls, and dispatchable location solutions are likely to become increasingly available with the rollout of 5G networks and improved indoor mapping of large buildings and other structures.”). Additionally, Verizon’s comments in the Wireless E911 Location Accuracy Requirements proceeding indicate that it has begun delivering dispatchable location information from certain devices and that it plans to incorporate dispatchable location capabilities into 5G home voice products. Comments of Verizon, *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114 at 7-8 (Feb. 21, 2020).

⁸ *Enhanced Emergency Data: Location and Medical ID Data for PSAPs*, Apple Inc. (Oct. 2020) (describing enhancements to the location information the iPhone and Apple Watch will provide for some emergency calls, enabling the delivery of the caller’s civic address – including apartment, suite, etc., if appropriate – along with coordinate-based location information).