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Re: Notice of *Ex Parte*, Docket Nos. GN 17-183; ET 18-295; PS 07-114; PS 15-80; ET 04-35

On January 29, Mark Reddish and I met with Commissioner Gomez and her legal advisor, Edyael Casaperalta. We discussed APCO's positions as stated in prior filings in the above-captioned dockets and summarized here.

6 GHz

APCO remains concerned that the expansion of unlicensed devices in the 6 GHz band presents a substantial threat of interference to public safety. Real-world testing has raised doubts over the technical assumptions underlying the Commission's decision to open the band. The 6 GHz multi-stakeholder group failed to meaningfully address interference concerns or otherwise provide value beyond consensus that incumbents should perform baseline testing of their systems in anticipation of interference. Public safety agencies lack the resources to promptly detect, identify, and eliminate interference from unlicensed devices, and viable alternatives to support mission critical communications in the event 6 GHz becomes untenable have yet to be identified.

APCO members who are responsible for operating these backbone microwave links supporting reliable public safety communications networks across the country are rightly concerned and look to the Commission for guidance. Accordingly, the Commission should respond to incumbents' long-standing requests for testing to validate assumptions about the risk of interference, development of mechanisms to promptly identify and eliminate interference, and consideration of cost recovery mechanisms as suggested in a petition for rulemaking that remains pending.¹

¹ Petition for Rulemaking of Utilities Technology Council et al, ET Docket No. 18-295, GN Docket No. 17-183 (filed Dec. 7, 2021).

Wireless 9-1-1 Location Accuracy

The Commission's rules require wireless carriers to provide a height estimate for 9-1-1 callers expressed as a "height above ellipsoid" and, "when feasible," dispatchable location information. Few 9-1-1 emergency communications centers (ECCs) have the resources to even explore how to make use of HAE-based vertical information (assuming this information is indeed accurate), which would require at a minimum substantial costs and resources including detailed building plans. The promise of dispatchable location has substantially faded since it was heralded by the industry and identified as the gold standard for public safety in the Commission's 2015 order. Further Commission action is needed to improve the transparency and reliability of testing to evaluate location technologies and to provide stronger requirements for carriers to deploy methods, several of which are feasible today, to derive dispatchable location.

Outage Notifications

When a network outage occurs that impacts the public's ability to reach 9-1-1, ECCs can take steps to mitigate the impact of the outage to the communities they serve if they have timely and descriptive notifications. To better support ECCs, the Commission should build upon prior orders to explore lowering the currently high outage notification thresholds, requiring notifications to include visual information about outages, and requiring service providers to undertake a fundamental task to develop a two-way contact database for ECCs and service providers to use during suspected or confirmed outages. As it stands, ECCs often lack appropriate contact information to use when they discover outages on their own, and a two-way database would be mutually-beneficial.

Respectfully Submitted,

APCO INTERNATIONAL

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