September 22, 2023

Marlene Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Notice of Ex Parte, PS Docket Nos. 21-479, 18-64, 07-114

On September 21, I met with Carmen Scurato, Legal Advisor, Consumer and Public Safety, for Chairwoman Jessica Rosenworcel, to discuss the above-captioned proceedings.

Consistent with APCO’s comments and reply comments regarding the proceeding on Facilitating Implementation of Next Generation 9-1-1, I explained the importance of aligning any Commission actions with the broad consensus of the public safety community. The Commission must approach rules for NG9-1-1 in a manner that promotes a common understanding of the public safety community’s goals and expectations for NG9-1-1 and does not conflict with the comprehensive vision and definitions outlined in pending federal NG9-1-1 funding legislation.\(^1\) For example, I emphasized that the single most important step the Commission can take would be to adopt requirements for achieving interoperability between originating service providers and 9-1-1 service providers, and among 9-1-1 service providers.

We also discussed issues that warrant further examination, potentially through a further notice of proposed rulemaking. For instance, there remains a lack of consensus on the best method for service providers to deliver NG9-1-1 traffic in an IP-based format.

Finally, I expressed APCO’s support for the Commission to proceed as soon as possible with adopting a rule requiring location-based routing for wireless 9-1-1 calls, and to explore additional avenues for ensuring that emergency communications centers receive actionable location information in the form of dispatchable location.

\(^1\) See Next Generation 9-1-1 Act of 2023, H.R. 1784, 118th Cong. (2023).
Respectfully Submitted,

APCO INTERNATIONAL

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