

Leaders in Public Safety Communications®

CHIEF EXECUTIVE OFFICER

Derek K. Poarch poarchd@apcointl.org

EXECUTIVE DIRECTOR

Mel Maier maierm@apcointl.org

HEADQUARTERS

J. Rhett McMillian, Jr. Building 351 North Williamson Boulevard Daytona Beach, FL 32114-1112 386-322-2500

EXECUTIVE OFFICES Gregory T. Riddle Building

1426 Prince Street Alexandria, VA 22314 571-312-4400

www.apcointl.org

BOARD OF DIRECTORS 2023 - 2024

EXECUTIVE COMMITTEE

President

Becky Neugent, CPE becky@autauga911.com

First Vice President

Stephen P. Martini, RPL, CPE stephen.martini@nashville.gov

Second Vice President

Mark Spross, RPL, CPE mark.spross@metcom911.com

Immediate Past President

Angela R. Batey, RPL, CPE abatey@gpstc.org

East Coast Region

David D. Dodd, RPL Brian E. LaMonica, RPL, CPE

Gulf Coast Region

Paul A. McCallister, RPL Jack Varnado, RPL

North Central Region

Jessica Loos, RPL Michael R. O'Connor

Western Region

Jennifer Reese, CPE Melissa Stroh, MBA, CPM

Commercial Advisory Council

Jessica Long

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. 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

By:

Jeffrey S. Cohen Chief Counsel (571) 312-4400 cohenj@apcointl.org