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February 16, 2021

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

Re: Notice of *Ex Parte*, ET Docket Nos. 04-35, 18-295, GN Docket No. 17-183, PS Docket Nos. 07-114, 11-60, 13-75, 15-80, 15-91, 15-94; WP Docket No. 07-100

On February 11, the undersigned, along with Mark Reddish and Alison Venable, met via web conference with representatives of the Public Safety and Homeland Security Bureau to discuss APCO's regulatory priorities.¹ As summarized below, APCO reiterated its goals and concerns for several ongoing proceedings.

Wireless 9-1-1 Location Accuracy

• APCO expressed continued interest in pursuing reasonable rule changes to ensure 9-1-1 professionals receive actionable location information for wireless 9-1-1 calls.

Unlicensed Use of the 6 GHz Band

• The current approach to open the band for shared use with hundreds of millions of new unlicensed devices presents a significant risk for public safety.

4.9 GHz Band

• The Commission should act on APCO's Petition for Reconsideration² to reverse course and work with the public safety community to develop an alternative approach for increasing public safety use of the band.

¹ Jeff Cohen, APCO International's Public Safety Communications Priorities for the New Year, APCO International: TabletopX (Jan. 28, 2021) *available at* https://www.apcointl.org/apco-internationals-public-safety-communications-priorities-for-the-new-year/.

² APCO International Petition for Reconsideration, WP Docket No. 07-100 (filed Dec. 29, 2020).

Requirements for Outage Reporting and an ECC-Carrier Contact Database

• Emergency communications centers (ECCs) need timely and actionable information about network outages and disruptions that could impact communications with ECCs, as well as a two-way contact database for ECCs and service providers established and maintained by the service providers.

Wireless Emergency Alerts

• Wireless Emergency Alerts should be delivered with the enhanced geotargeting capabilities promised by the Commission's 2018 Report and Order³ and with the multimedia capabilities made possible by modern wireless networks.

Respectfully submitted,

APCO INTERNATIONAL

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³ Wireless Emergency Alerts, Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System, PS Docket Nos. 15-91, 15-94, *Second Report and Order*, 33 FCC Rcd 1320 (2018) (noting that the enhanced geotargeting requirements must be applied to devices already in circulation and not just new devices).