

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

In the Matter of	)	
	)	
Improving 911 Reliability	)	PS Docket No. 13-75

COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials-International, Inc. (APCO)¹ submits the following comments in response to the Bureau’s Public Notice in the above-captioned proceeding.² The Bureau seeks comment on a variety of matters related to the existing 9-1-1 reliability rules.³ Given that the certification rules are relatively new, certification information is not publicly available, and the nature of services and service providers is rapidly changing, APCO’s suggestions here are limited to addressing the increasing complexity of the 9-1-1 ecosystem and improving PSAPs’ awareness of outages.

I. Ensuring Reliability in the Evolving 9-1-1 Ecosystem

The Bureau seeks comment on whether the industry participants in the transitional and NG9-1-1 environment are adequately encompassed by the term “covered 911 service provider” and whether to revise the definition of that term.⁴ While APCO does not want to deter innovation and competition from new participants, these benefits must be balanced with the need for reliability, which might only be achieved by expanding the scope of regulations.

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 30,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including 9-1-1 Public Safety Answering Points (PSAPs), dispatch centers, emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

² In the Matter of Improving 911 Reliability, PS Docket No. 13-75, *Public Notice*, DA 18-612 (Public Safety and Homeland Security Bur. rel. Jun. 13, 2018) (“Notice”).

³ *Id.* at 1.

⁴ *Id.* at 3.

The Commission should consider expanding the definition of “covered 911 service provider” to include any entity that provides 9-1-1, E9-1-1, or NG9-1-1 capabilities, directly or *indirectly*. The reliability rules should ensure that any service intended for use during emergencies meets a minimum level of reliability. In some cases, entities without a direct relationship to a PSAP have found methods to impact the ALI, routing, or supplemental data relevant to a 9-1-1 call.⁵ APCO and others have pointed out the importance of ensuring that any new solutions are integrated into the 9-1-1 ecosystem in ways that are reliable and secure.⁶ The Commission should explore these issues further and if appropriate take action to ensure reliability for 9-1-1 without discouraging entities from providing helpful solutions for public safety.

II. Improve Situational Awareness for PSAPs

The Bureau asks if the current PSAP notification rules for covered 9-1-1 service providers are effective in helping PSAPs gain timely information about outages that affect 9-1-1 services and take appropriate measures to help maintain continuity of access to emergency services.⁷ The current rules could be much improved upon to make notifications more streamlined, timely, detailed, and actionable, and extend to outages that are of consequence to PSAP operations but do not meet the high threshold for what constitutes an outage that potentially affects a “911 special facility.”

PSAPs should receive real-time outage information in an easily accessible format that provides situational awareness with regard to the timing, nature, and scope of any impacts to

⁵ See Ex Parte Letter of APCO, CTIA, and NENA, RM-11780, PS Docket No. 07-114, 1-2 (filed Apr. 4, 2018).

⁶ *Id.* at 1-3.

⁷ Notice at 3.

9-1-1 services.⁸ This could be achieved by providing coordinate boundaries for the outage area, GIS files, or text information from the covered service providers' internal reporting systems that can be integrated into the PSAPs' mapping and/or CAD systems to provide a visual representation of the affected area. This type of "notification" would be far more actionable and a valuable supplement to the existing requirement of notification by telephone and in writing. Further, by integrating the information into PSAPs' existing systems, carriers would have a streamlined method to notify PSAPs, negating the need for specific notification intervals and thresholds.

Respectfully submitted,

APCO INTERNATIONAL

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⁸ Stakeholders broadly supported this recommendation during the Bureau's September 2017 workshop to discuss best practices for improving situational awareness during 9-1-1 outages. See Public Safety and Homeland Security Bureau Shares Recommended Practices from September 11, 2017 911 Workshop, PS Docket No. 17-68, *Public Notice*, DA 18-6, 1-2 (Public Safety and Homeland Security Bur. rel. Jan. 2, 2018).