

information about these types of disruptions may help guide next steps for the revision of the Commission's 9-1-1 outage reporting requirements.⁵

In light of BGP vulnerabilities and other threats to reliability for public safety communications, networks supporting emergency communications should be designed for high reliability and redundancy. Among other things, this should mean network diversity with no single point of failure and cybersecurity measures incorporated as part of system design. As the Bureau examines BGP vulnerabilities, APCO encourages a comprehensive approach that addresses the many cyber challenges facing ECCs. For example, APCO supports further consideration of options to support cybersecurity for ECCs, such as the EC3 model described in the TFOPA report.⁶

Finally, vulnerabilities threatening the security and integrity of BGP present risks to public safety that are not limited to 9-1-1 calls, such as emergency alerts and first responder communications. Given the unique public safety concerns present in the event of a cyber-attack on a 9-1-1 center or public safety communications systems, the Commission should ensure service providers implement appropriate security measures to protect emergency communications.

Respectfully submitted,

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⁵ See Comments of APCO International, PS Docket Nos. 15-80, 13-75, ET Docket No. 04-35 (filed July 30, 2021) (explaining that improved knowledge of the type and scope of network outages impacting 9-1-1 will help determine how to revise the rules on outage reporting thresholds and notification requirements).

⁶ See Federal Communications Commission, Task Force on Optimal PSAP Architecture (TFOPA), Adopted Final Report (2016) available at https://transition.fcc.gov/pshs/911/TFOPA/TFOPA_FINALReport_012916.pdf; See also Comments of APCO International, PS Docket No. 21-343, CG Docket No. 12-129, at 2-3 (filed Dec. 1, 2021).

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