

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

In the Matter of)	
)	
Single Network Future: Supplemental Coverage)	GN Docket No. 23-65
From Space)	
)	
Space Innovation)	IB Docket No. 22-271

COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials International, Inc. (APCO)¹ submits these comments in response to the Further Notice of Proposed Rulemaking in the above captioned proceeding.² The Commission seeks comment on several issues related to the provision of 9-1-1 service under the recently-adopted Supplemental Coverage from Space (SCS) framework, which will enable collaborations between satellite operators and terrestrial service providers to offer ubiquitous connectivity directly to consumer handsets using spectrum previously allocated only to terrestrial service. APCO appreciates that a primary goal of this proceeding is promoting public safety by expanding the availability of emergency communications.³ Here, APCO offers suggestions on ways to improve public safety communications over SCS.

Under the new SCS framework, the Commission requires SCS 9-1-1 calls and texts to be routed directly to an emergency communications center (ECC) using location-based routing or to

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 40,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including 9-1-1 Emergency Communications Centers (ECCs), emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

² Single Network Future: Supplemental Coverage from Space, Space Innovation, GN Docket No. 23-65, IB Docket No. 22-271, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 24-28 (rel. Mar. 15, 2024) (“R&O and FNPRM”).

³ *Id.* at para. 173.

an intermediate emergency call center, at which call center personnel must determine the emergency caller's phone number and location and then transfer or otherwise direct the SCS call or text to an appropriate ECC.⁴ The Commission seeks comment on whether to require the use of location-based routing rather than delivery to an intermediate call center, if technically feasible.⁵ APCO agrees that location-based routing is likely to result in the least delay in delivering the SCS 9-1-1 call or text to an appropriate ECC⁶ and encourages the Commission to extend these requirements to SCS 9-1-1 calls to the extent feasible. APCO looks forward to reviewing responses to the Commission's request for information on the technical feasibility of obtaining location information for routing purposes under the SCS framework. As APCO previously suggested, the Commission should not accept broad claims of infeasibility and instead require clear and convincing evidence.⁷ The Commission should seek to ensure the public has a comparable experience with 9-1-1 regardless of whether the 9-1-1 call was made via terrestrial or satellite communications infrastructure.

The Commission asks whether to require terrestrial providers to use location-based routing for SCS 9-1-1 voice calls only when location information meets certain thresholds for accuracy and timeliness.⁸ APCO agrees that terrestrial providers should be required to use location-based routing for SCS 9-1-1 calls when location information is available at time of routing. Additional information from terrestrial providers about the accuracy of location information likely to be available at time of routing will be helpful for determining whether to

⁴ *Id.* at para. 174.

⁵ *Id.* at para. 241.

⁶ *Id.* at para. 180.

⁷ Comments of APCO International, GN Docket No. 23-65, IB Docket No. 22-271 at 3 (filed May 12, 2023).

⁸ R&O and FNPRM at para. 244. For example, the Commission might apply the thresholds adopted for wireless location-based routing rules and only require terrestrial providers to use location-based routing for SCS 9-1-1 calls when location information meets an accuracy threshold of 165 meters at a confidence level of at least 90% and is available to the network at the time of routing the call.

establish an accuracy threshold and, if so, whether to deviate from the threshold established for location-based routing of wireless 9-1-1 calls.

The Commission seeks comment on several other issues important for SCS 9-1-1 service: how location information will be presented to ECCs; whether and how to adopt a new class of service for SCS calls;⁹ and how terrestrial providers will prioritize among their own networks, other terrestrial networks with and without roaming agreements, Wi-Fi, and SCS networks when establishing policies to select the best path for a 9-1-1 call.¹⁰ These issues are likely best addressed through a collaboration between industry and public safety stakeholders in a forum such as ATIS.

Respectfully submitted,

APCO INTERNATIONAL

By:

Jeffrey S. Cohen
Chief Counsel
(571) 312-4400 ext. 7005
cohenj@apointl.org

Mark S. Reddish
Senior Counsel
(571) 312-4400 ext. 7011
reddishm@apointl.org

Alison P. Venable
Government Relations Counsel
(571) 312-4400 ext. 7004
venablea@apointl.org

May 30, 2024

⁹ *Id.* at para. 251.

¹⁰ *Id.* at para. 249.