

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

In the Matter of)
)
Reliability and Continuity of Communications) PS Docket No. 11-60
Networks, Including Broadband Technologies)

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 the effectiveness of the Wireless Network Resiliency Cooperative Framework and on a future Commission study that will address the public safety benefits, technical feasibility, and cost of providing the public with access to 9-1-1 services via WiFi access points and other technologies when mobile service is unavailable.³

I. Wireless Resiliency Framework

A. PSAPs Need Timely, Actionable Information About Outages

PSAPs and the other public safety agencies they interact with would benefit from receiving granular, real-time situational awareness of outages.⁴ Specifically, PSAPs need 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 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 Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket No. 11-60, *Public Notice*, DA 18-614 (Public Safety and Homeland Security Bur. rel. Jun. 13, 2018) (“Notice”).

³ *Id.* at 1-2.

⁴ APCO has previously commented on the importance of situational awareness for PSAPs during outages. Situational awareness for PSAPs is vital whether or not a disaster is occurring, and APCO continues to seek options for notifying PSAPs about any outages that affect 9-1-1 service. *See* Comments of APCO, PS Docket No. 17-344, 4-5 (filed Jan. 22, 2018); Ex Parte Letter of APCO, PS Docket No. 17-68, 1-2 (filed Apr. 10, 2017); Comments of APCO, PS Docket Nos. 13-239, 11-60, 4-5 (filed May 31, 2016); Ex Parte Letter of APCO, PS Docket Nos. 13-239, 11-60, 1 (filed Oct. 9, 2015); Comments of APCO, PS Docket Nos. 13-239, 11-60, 2-3 (filed Jan. 17, 2014);

know where and when a site is not operational, the nature of the outage (physical tower down, power out, antenna out of service, etc.), and expected repair time. PSAPs should have this information in a format that can be used to easily assess the problem and immediately take steps to mitigate the impact. This could be achieved by providing coordinate boundaries for the outage area, GIS files, or text information from internal carrier reporting systems that can be integrated into the PSAP's mapping and/or CAD systems to provide a visual representation of the affected area. The Framework includes a commitment for the carriers to support the Commission making Disaster Information Reporting System (DIRS) data regarding the total number of cell sites out of service publicly available on its website on an industry-aggregated, county-by-county basis.⁵ Though this information is helpful for some purposes, APCO encourages the Commission and the carriers to explore methods for providing information to PSAPs that will meet their immediate, operational needs.

B. The Wireless Carriers Must Fulfill Their Commitment to Establish a Carrier-PSAP Contact Database

The Commission's decision to forgo further regulations to improve wireless resiliency in 2016 was based in part on the carriers' voluntary Framework, including the commitment to "establishing a provider/PSAP contact database."⁶ Carriers and PSAPs could both benefit from such a resource. The database should include contact information for PSAPs and carriers, and be available to PSAPs for use in the event of *any* wireless outage impacting origination or 9-1-1

Comments of APCO, PS Docket Nos. 13-75, 11-60, 3-5 (filed May 13, 2013); Comments of APCO, PS Docket 11-60, 3-5 (filed Aug. 17, 2012).

⁵ In the Matter of Improving the Resiliency of Mobile Wireless Communications Networks, Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket Nos. 13-239, 11-60, *Order*, FCC 16-173, at para. 15 (rel. Dec. 20, 2016) ("Order").

⁶ *See id.* at paras. 5, 11.

networks, whether large-scale or localized, and including disaster-related and “sunny day” outages.⁷

The Commission should clarify that the responsibility to establish and maintain the database rests with the carriers. As reflected by the commitments in the voluntary Framework, the carriers have an inherent responsibility to support public safety. Thus, the carriers should establish and make available to PSAPs a secure mechanism for the sole purpose of ensuring that PSAPs know who to contact in the event of an outage and for carriers to promptly notify PSAPs when they become aware of an outage. As with the National Emergency Address Database, which was established by CTIA as part of an agreement between APCO, NENA, and the nation’s largest wireless carriers, public safety should not bear responsibility for establishing or maintaining the contact database, and its use should be limited to the operational purposes for which it is designed.⁸ The information in the carrier-PSAP contact database should not be monetized, and the carriers should be responsible for ensuring that the database is secure and only used for legitimate purposes.⁹

APCO remains supportive of expanding the Framework to include non-nationwide carriers and ensuring commitments such as the contact database and voluntary roaming among

⁷ Under the Framework, carriers committed to provide the database to state Emergency Operations Center (EOC) representatives, and when the National Response Coordination Center activates Emergency Support Function # 2 and the Commission activates DIRS for a given emergency or disaster. *See* Wireless Network Resiliency Cooperative Framework, PS Docket Nos. 13-239, 11-60, 3 (filed Apr. 27, 2016). As APCO pointed out, during disasters, EOCs may or may not be activated, but PSAPs are always operational. Comments of APCO, PS Docket Nos. 13-239, 11-60, 4 (filed May 31, 2016).

⁸ In the Matter of Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, *Fourth Report and Order*, FCC 15-9, at para. 71 (rel. Feb. 3, 2015) (“We require that, as a condition of using the NEAD or any information contained therein to meet our 911 location requirements, and prior to use of the NEAD, CMRS providers must certify that they will not use the NEAD or associated data for any purpose other than for the purpose of responding to 911 calls, except as required by law.”).

⁹ To ensure PSAPs’ contact information will remain secure and only used for legitimate purposes, APCO is open to exploring the viability of the Commission establishing and maintaining the database and notes that the New and Emerging Technologies 911 Improvement Act of 2008 may provide direct authority for such a role. *See* 47 U.S.C. 615a-1(g).

carriers have the greatest impact possible to improve public safety. APCO looks forward to the carriers establishing the database and stands ready to assist the carriers with populating it.

C. Incorporating Backhaul Providers in the Framework

The Bureau seeks comment on whether backhaul providers should be encouraged to participate in the Framework and work cooperatively with wireless providers and other relevant stakeholders to develop a process for sharing restoration information during disasters.¹⁰ As a general matter, APCO supports any proposal that would improve the resiliency and restoration of communications systems and information sharing during disasters.

II. Commission Study on Access to 9-1-1 Services During Emergencies

To ensure that the public always has access to emergency assistance in the event of a failure in traditional options, APCO supports exploration of alternative methods of communication. Accordingly, APCO is interested in learning more about how WiFi access points and other technologies can be used for contacting 9-1-1 when mobile service is unavailable. At the same time, it will be important to explore any cybersecurity implications, methods of routing to the appropriate PSAP, and accurate location and callback capabilities. The public's ability to contact 9-1-1 and reliably receive assistance should be consistent, regardless of the technology used.

Respectfully submitted,

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¹⁰ Notice at 2-3.

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