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45 L Street, NE
Washington, DC 20554

**Re: Notice of *Ex Parte*, PS Docket Nos. 13-75, 15-80; ET Docket
No. 04-35**

Pursuant to section 1.1204(a)(10) of the Commission's rules,¹ on April 20 at 12:30 P.M., in response to a request from Carolyn Roddy, Chief of Staff and Senior Legal Advisor for Commissioner Simington. I provided clarification on two of APCO's suggestions² for the draft Notice of Proposed Rulemaking (NPRM) on 9-1-1 outage notifications.³

To address the suggestion that emergency communications centers (ECCs) should be notified of outages and disruptions that could impact communications with ECCs, even if the outage does not meet the high thresholds that trigger a notification requirement in the existing rules, the NPRM could seek comment on the frequency and extent of such disruptions and outages, recognizing that service providers are likely to have better data about these events than ECCs.

With regard to a contact information database, I noted a prior suggestion that a blanket safe harbor policy for service providers electing to rely on a third party database outside their control would be overly-broad. Accordingly, the NPRM could ask, "Rather than establishing a safe harbor rule, would service providers' liability concerns be more appropriately addressed if we require measures to ensure the accuracy of the database that are at least as stringent as the measures they have deemed necessary for their own databases?"

¹ 47 C.F.R. § 1.1204(a)(10).

² Letter from Mark Reddish, Senior Counsel, APCO International, to Marlene H. Dortch, Secretary, Federal Communications Commission in PS Docket Nos. 13-75, 15-80 and ET Docket No. 04-35 (filed Apr. 15, 2020).

³ Improving 911 Reliability; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; New Part 4 of the Commission's Rules Concerning Disruptions to Communications, PS Docket Nos. 13-75, 15-80; ET Docket No. 04-35, *Third Notice of Proposed Rulemaking*, FCC-CIRC2104-04 (rel. Apr. 1, 2021).

Respectfully submitted,

APCO INTERNATIONAL

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