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November 13, 2018

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Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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

On November 8, Nicole Zimbelman, Cole Blum, and I spoke by phone with representatives of the Public Safety and Homeland Security Bureau. During the meeting, the Bureau asked about APCO's perspective on permitting direct access to the Network Outage Reporting System (NORS) and the Disaster Information Reporting System (DIRS) by 9-1-1 Emergency Communications Centers (ECCs).

APCO stated that although access to NORS and DIRS data would be helpful, it is more important that ECCs receive timely, actionable information regarding *any* outage that affects 9-1-1 service, including directly from communications service providers. ECCs should receive outage information in an easily accessible format that provides situational awareness with regard to the timing, nature, and scope of any impacts to 9-1-1 service. 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 ECC's mapping and/or CAD systems to provide a visual representation of the affected area. APCO also discussed the need for participating wireless carriers to fulfill their commitment to establish a carrier/ECC contact database, under the Wireless Network Resiliency Cooperative Framework, that would be made available to ECCs for use in the event of any wireless outage impacting origination or 9-1-1 networks.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically with your office.

Respectfully submitted,

/s/

Jeffrey S. Cohen
Chief Counsel

CC (via email):
James Wiley
Brenda Villanueva
Tiffany Wong