

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Facilitating Implementation of Next Generation
911 Services (NG911)

Improving 911 Reliability

PS Docket No. 21-479

PS Docket No. 13-75

**REPLY COMMENTS OF
THE PUBLIC SAFETY NEXT GENERATION 9-1-1 COALITION:**

APCO INTERNATIONAL

CONGRESSIONAL FIRE SERVICES INSTITUTE

INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE

INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

MAJOR CITIES CHIEFS ASSOCIATION

MAJOR COUNTY SHERIFFS OF AMERICA

METROPOLITAN FIRE CHIEFS ASSOCIATION

NATIONAL ASSOCIATION OF STATE EMS OFFICIALS

NATIONAL FRATERNAL ORDER OF POLICE

NATIONAL ORGANIZATION OF BLACK LAW ENFORCEMENT EXECUTIVES

NATIONAL SHERIFFS' ASSOCIATION

September 8, 2026

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I. INTRODUCTION AND SUMMARY

The Public Safety Next Generation 9-1-1 Coalition respectfully submits these joint reply comments on the Federal Communications Commission’s *Second Further Notice of Proposed Rulemaking*.¹ The transition to Next Generation 911 (NG911) presents a fundamental shift from legacy 911 systems to digital, IP-based infrastructure capable of supporting life-saving communications tools that can transform emergency response. The Public Safety Next Generation 9-1-1 Coalition is committed to the principle that an NG911 system should enable 911 professionals and other first responders to utilize voice, text, data, and video to better respond to calls for emergency assistance in the way the public expects today. NG911 should be technologically and competitively neutral, use commonly accepted standards (rather than proprietary solutions) that promote interoperability, make mutual aid between agencies more effective, increase choices, decrease costs, and include cybersecurity as a primary consideration.² Realizing the full promise of NG911, however, requires the Commission’s support.

¹ *Facilitating Implementation of Next Generation 911 Services (NG911); Improving 911 Reliability*, PS Docket Nos. 21-479 and 13-75, Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 26-39 (rel. June 26, 2026) (“*Second Report and Order*” and “*Second Further Notice*,” as appropriate).

² See *About the Coalition*, Public Safety Next Generation 9-1-1 Coalition, <https://ng911coalitionorg.wordpress.com/about-the-coalition/>. Members of the Coalition joining this filing are the Association of Public-Safety Communications Officials International, Inc. (APCO); the Congressional Fire Services Institute (CFSI); the International Association of Chiefs of Police (IACP); the International Association of Fire Chiefs (IAFC); the Major Cities Chiefs Association (MCCA); the Major County Sheriffs of America (MCSA); the

We commend the Commission for taking the foundational step of establishing baseline definitions of NG911 and interoperability. To give these definitions operative and meaningful effect, however, the Commission must require that the equipment and services offered by NG911 service providers to 911 Authorities satisfy these definitions. Specifically, NG911 service providers must ensure that their services and equipment enable the interoperable exchange of “911 voice, text, data, and multimedia” across “the entire call flow from initiation through resolution.”³ The Commission should establish a reasonable but firm deadline of 24 months for developing any needed solutions, finalizing any necessary technical standards, and completing any coordination or other work required to achieve interoperability. Following this period, NG911 service providers should be required to certify that they comply with this requirement.

Interoperability is a defining component of end-state NG911.⁴ Without a mandate from the Commission, continued deployment of IP-based 911 systems risks embedding incompatibilities and increasing costs for 911 Authorities. History has repeatedly taught us the difficult lesson that a lack of interoperability can delay emergency response and place lives at risk. The 9/11 Commission found, for example, that the 911 operators for the New York City Police Department and the dispatchers for the Fire Department of the City of New York were “not adequately integrated into the emergency response.” Because evacuation guidance was not conveyed to them, some callers in the South Tower were not told they should attempt to descend rather than ascend.⁵ Even before that, in 1982, when Air Florida Flight 90 struck the 14th Street Bridge and then plunged in the Potomac River, some responding agencies could not

Metropolitan Fire Chiefs Association (Metro Fire Chiefs); the National Association of State EMS Officials (NASEMSO); the National Fraternal Order of Police (FOP); the National Organization of Black Law Enforcement Executives (NOBLE); and the National Sheriffs’ Association (NSA).

³ See *Second Report and Order* ¶ 117 (defining “interoperability” and describing the intent in establishing this definition).

⁴ *Id.* ¶ 113 (citing TFOPA, Working Group 2, Phase II Supplemental Report: NG9-1-1 Readiness Scorecard (Dec. 2, 2016)).

⁵ National Commission on Terrorist Attacks Upon the United States, *The 9/11 Commission Report: Final Report of the National Commission on Terrorist Attacks Upon the United States* at 318 (July 22, 2004), <https://www.govinfo.gov/content/pkg/GPO-911REPORT/pdf/GPO-911REPORT.pdf> (discussing the impact of 911 calls on evacuation and noting that 911 operators were not adequately integrated into emergency response).

communicate because their radios could not access the common mutual-aid channels.⁶ And now, the record in this proceeding demonstrates that interoperability challenges are already emerging during the transition to NG911 and, if left unaddressed, could prevent NG911 from realizing its full promise. The Commission’s vision of “a NG911 ecosystem where 911 Authorities can seamlessly receive, process, and share emergency requests across different jurisdictions, technologies, devices, and systems”⁷ can be achieved only through the adoption and enforcement of substantive interoperability requirements.

II. THE COMMISSION SHOULD ADOPT INTEROPERABILITY REQUIREMENTS FOR NG911 WITHOUT FURTHER DELAY.

We urge the Commission to put first principles first in building the framework for NG911 interoperability: definitions, such as those already established by the Commission, identify the required outcome; substantive requirements make that outcome mandatory; and finally, testing, certification, or other compliance mechanisms provide the means to evaluate and demonstrate whether that outcome has been achieved. By adopting clear definitions for NG911 and interoperability, the Commission has laid a strong foundation. Earlier in this proceeding, the Commission adopted a definition of “Next Generation 911” as a system that, among other things, “[e]nsures interoperability,”⁸ as well as a definition of “interoperability” that requires NG911 service providers to be capable of exchanging traffic “between jurisdictions ... regardless of jurisdiction.”⁹ Read together, these definitions establish the important foundational premise that a system is not truly NG911 unless it can interoperate nationwide. These definitions standing alone, however, do not establish an interoperability requirement. We urge the Commission to take the essential next step of translating those definitions into clear, substantive requirements, as described in greater detail below.

⁶ Public Safety Wireless Advisory Committee, *Final Report of the Public Safety Wireless Advisory Committee to the Federal Communications Commission and The National Telecommunications and Information Administration*, at 504 (Sept. 11, 1996), https://www.npstc.org/documents/PSWAC_AL.pdf.

⁷ *Second Report and Order* ¶ 115.

⁸ 47 CFR § 9.28 (defining *Next Generation 911 (NG911)*); see *Facilitating Implementation of Next Generation 911 Services (NG911)*, Report and Order, 39 FCC Rcd 8137, Appendix A § 9.28 (2024) (*NG911 Transition Order*).

⁹ *Second Report and Order* ¶ 117 (codified at 47 CFR § 9.19(a)(19)).

A. The Commission Should Establish a Substantive Interoperability Requirement.

The Commission, in its *Second Further Notice*, seeks comment on proposals to promote and accelerate interoperability.¹⁰ The Commission cannot advance that objective without first establishing a substantive, outcome-based requirement that NG911 service providers must provide interoperable services and equipment.¹¹

While the Commission’s proposed interoperability testing requirement, described in the *Second Further Notice*, could effectively establish a limited obligation for NGCS and ESInet providers to demonstrate successful transfers among a closed set of designated facilities and providers,¹² it would not establish a generally applicable requirement that NG911 service providers offer services and equipment to 911 Authorities in a manner that satisfies the Commission’s definitions of NG911 and interoperability. Testing interoperability among “at least two other states” and “with three similar but different NGCS and ESInet providers,” as proposed in the *Second Further Notice*, would not demonstrate that traffic could be exchanged between jurisdictions, “regardless of jurisdiction,” in satisfaction of the Commission’s definition of interoperability. Indeed, the Commission recognizes that simply adopting testing requirements is not establishing an interoperability requirement by proposing that interoperability testing be implemented after “the effective date of any interoperability requirements adopted in the future.”¹³ We cannot effectively evaluate an interoperability testing framework, however, without first establishing the substantive interoperability obligation that is being tested.

¹⁰ See also *Second Further Notice* ¶¶ 186-187 (seeking comment on “proposals to promote and accelerate the implementation of interoperability across the NG911 ecosystem” and proposing that any interoperability testing requirement would apply “within three years of the effective date of any interoperability requirements adopted in the future”).

¹¹ Testing and certification can then serve as mechanisms for evaluating and demonstrating compliance with this underlying requirement.

¹² See also *Second Further Notice* ¶¶ 186-187 (seeking comment on “proposals to promote and accelerate the implementation of interoperability across the NG911 ecosystem” and proposing that any interoperability testing requirement would apply “within three years of the effective date of any interoperability requirements adopted in the future”).

¹³ *Id.* ¶ 187.

We therefore urge the Commission to require all NG911 service providers to ensure that their services and equipment enable the interoperable exchange of 911 traffic—including voice, text, data, and multimedia, with location information and necessary metadata—between 911 Authorities and other service providers, regardless of jurisdiction, and to do so in conformance with commonly accepted standards.¹⁴ The Commission’s definitions are straightforward: NG911 is a system that (1) ensures interoperability; (2) is secure; (3) employs commonly accepted standards; (4) enables ECCs to receive, process, and analyze all types of 911 requests for emergency assistance; (5) acquires and integrates additional information useful to handling 911 requests for emergency assistance; and (6) supports sharing information related to 911 requests for emergency assistance among emergency communications centers and emergency response providers.¹⁵ Interoperability, in turn, is “[t]he technical and operational capability of NG911 service providers to exchange 911 voice, text, data, and multimedia between jurisdictions, PSAPs, ECCs, and other service providers, in real time without the need for proprietary interfaces and regardless of jurisdiction, equipment, device, software, service provider, or other relevant factors.”¹⁶ The Commission adopted these definitions after full consideration of the record, and they should form the basis for the corresponding substantive requirements.

The Commission should require providers to support the “successful transfers” it has proposed: the ability to exchange traffic using SIP-based call handoff capability, preservation of caller location and media metadata, compliance with commonly accepted standards, and cross-jurisdictional validation.¹⁷ We agree with Intrado, which suggests requiring “full processing, display, and transfer support, including call

¹⁴ We recognize that the services and equipment offered by NG911 service providers are only part of the equation and that, in order to achieve interoperability, 911 Authorities must have completed Phase 2 of the NG911 transition.

¹⁵ 47 CFR § 9.28.

¹⁶ *Second Report and Order* ¶ 117. Although the Commission appears to have intended to adopt this definition and highlights the use of the new term “NG911 service providers,” the text incorporated into the Code of Federal Regulations is not identical to that in the body of the *Second Report and Order*. We assume this variance was not intentional. See 47 CFR § 9.19(a)(19)).

¹⁷ *Second Further Notice* ¶ 187.

and session transfer with location data intact. ... Partial adherence to this list should not be accepted.”¹⁸

These requirements should apply to all NG911 service providers, consistent with the Commission’s use of that term in its definition of interoperability.¹⁹

B. Requiring NG911 Interoperability Is Not Premature – Further Delay Risks Entrenching Incompatibilities.

The Commission should act now, while the transition to NG911 is still in its early stages, so that interoperability can be built into NG911 networks from the outset and not incorporated later, piecemeal, in varying stages of NG911 deployment. Without a substantive baseline obligation, public safety agencies will face the costly and complex task of correcting interoperability gaps after the fact. In the *2025 Further Notice*, the Commission rightly observed that, “[a]s the NG911 transition progresses, these interoperability issues are likely to manifest into incompatibilities detrimental to the processing and receipt of 911 traffic and related information by 911 Authorities across state lines.”²⁰ The record in response to the *Second Further Notice* validates this concern. Intrado, for example, says that “the lack of definition of substantive capabilities required” is creating uncertainty about how to prepare for interoperability testing.²¹ As Intrado says, “[a]bsent a firm minimum baseline enforced uniformly across NG9-1-1 deployments, every new interconnection becomes a bespoke integration project.”²² Nova Labs, too, urges that the Commission not defer adoption of substantive interoperability requirements: “Interoperability is a network-wide property. If each jurisdiction defines its own interoperability partners and requirements with no common federal minimum beneath them, the result is a set of pairwise

¹⁸ Comments of Intrado Life & Safety, Inc., PS Docket No. 13-75, PS Docket No. 21-479, at 6 (filed Aug. 10, 2026) (Intrado Comments). The Commission need not, however, reference or require conformance to any single standard, *see id.* at 2 (recommending that the Commission “define a foundational set of i3 features and elements that would establish i3 conformance for ESI-nets”). As discussed below, the Commission need require only that providers achieve interoperability and certify that they have done so. *See infra* parts II.B, II.C.

¹⁹ *See Second Report and Order* ¶ 117.

²⁰ *See Facilitating Implementation of Next Generation 911 Services (NG911); Improving 911 Reliability*, Further Notice of Proposed Rulemaking, 40 FCC Rcd 2668 ¶ 71 (2025) (*2025 Further Notice*).

²¹ Intrado Comments at 4.

²² *Id.* at 8.

arrangements rather than a network in which any NG911 system can transfer traffic to any other. ...

Deferring the federal baseline risks freezing that condition into a stubborn patchwork of local incompatibilities.”²³ We agree.

Should the Commission continue forward with establishing a testing framework without first establishing substantive interoperability requirements, it risks entrenching the very “patchwork of local incompatibilities” it seeks to eliminate through this proceeding. Without a common baseline of NG911 capabilities, a requirement for interoperability testing risks becoming an exercise in documenting and accommodating localized incompatibilities, rather than validating true interoperability as defined by the Commission. For example, iCERT and NASNA explain that interoperability between a given pair of 911 Authorities cannot meaningfully be tested unless they address “the operational purpose and scope of the proposed interoperability arrangement” as well as a number of additional considerations, such as “routing and transfer procedures, supported media and data types, location-information formats, cybersecurity controls, security configurations, network connectivity, path diversity, cost allocation, [and] contractual authority” among others.²⁴ While some of these considerations might appropriately vary based on the capabilities selected by each 911 Authority or other operational considerations, or might be appropriately left to private contractual arrangements, technical issues should be governed by commonly accepted standards and thus be consistent across jurisdictions. These matters should be addressed through uniform technology-neutral standards development that results in established, acknowledged, and identified capabilities between providers, rather than negotiated (and paid for) separately as individualized interoperability arrangements by 911 Authorities. As Intrado notes, interoperability testing should not take

²³ Comments of Nova Labs, Inc., PS Docket No. 21-479, at 3 (filed Aug. 4, 2026) (Nova Labs Comments).

²⁴ Comments of Industry Council for Emergency Response Technologies and the National Association of State 9-1-1 Administrators, PS Docket No. 13-75, PS Docket No. 21-479, at 6 (filed Aug. 10, 2026) (iCERT and NASNA Comments).

place until “all affected ESInets, NGCS providers, and 9-1-1 Authorities” can, among other things, represent that they meet a minimum NG911 technical baseline.²⁵

Some commenters suggest that existing standards are incomplete or not yet ready to support end-to-end interoperability; this only underscores the need for Commission action. Inherent in proposals to require vendors to make disparate systems interoperable upon request²⁶ or to defer Commission action while industry develops interoperability testing criteria and methodologies²⁷ is the premise that conformance to existing standards does not, by itself, achieve interoperability as the Commission has defined it. To the extent this is true, it can and should be resolved by industry through the development of commonly accepted standards that do achieve interoperability. Requiring conformance to commonly accepted standards is beneficial, but as the Commission decided in the 2024 *NG911 Transition Order*, dictating compliance with a specific standard is not.²⁸ Solutions should be technology neutral so as not to interfere with ongoing technological improvements.²⁹ A standards-based approach that leverages new and emerging technologies will also strengthen cybersecurity by enabling vulnerabilities, safeguards, and updates to be addressed consistently across NG911 implementations, rather than through disparate proprietary arrangements.

In other areas, including NG911, the Commission has required industry participants to achieve standard-based outcomes by dates certain, while leaving the detailed technical work to industry and

²⁵ Intrado Comments at 12.

²⁶ See iCERT and NASNA Comments at 3, 8 (advocating that the Commission adopt a request-based interoperability implementation framework); Comments of Motorola Solutions Connectivity, Inc., PS Docket No. 21-479, at 5 (filed Aug. 10, 2026) (Motorola Comments) (advocating that the Commission require Covered 911 Service Providers to act in good faith to negotiate commonly accepted standards-based network-to-network interface agreement with each other).

²⁷ Comments of NENA: The 9-1-1 Association, PS Docket Nos. 13-75, 21-479, at 3-6 (filed Aug. 10, 2026).

²⁸ *NG911 Transition Order* ¶ 40.

²⁹ In addition to the NENA i3 standard, we note that other standards bodies, including 3GPP, develop standards relating to emergency calling. See *Location-Based Routing for Wireless 911 Calls*, Report and Order, 39 FCC Rcd 527 ¶ 14 (2024). Of note, 3GPP TS 23.167 “defines the Stage 2 service description for emergency services within the IP Multimedia Subsystem (IMS), covering the architectural requirements and network elements necessary to support IP-based emergency calls.” See *TS 23.167 - IP Multimedia Subsystem (IMS) emergency sessions | 3GPP Explorer*, <https://www.3gpp.org/dynareport/23167.htm>.

standards bodies.³⁰ It can do so here as well. Notably, because the Commission has previously signaled that it will mandate interoperability, it would be fair to presume that industry stakeholders have already been working on this issue, such that a 24-month timeline here is very reasonable.³¹

C. The Commission Should Adopt a Certification Requirement.

NG911 service providers should be required to certify their compliance with a baseline interoperability requirement within twenty-four months of the effective date of the Commission's rules. Specifically, NGCS and ESInet providers should be required to certify that they possess and offer the technical and operational capability to exchange, in real time, NG911 voice, text, data, multimedia, caller location, and necessary metadata between 911 Authorities and other service providers, regardless of jurisdiction, in conformance with commonly accepted standards and without the need for proprietary interfaces.³² Consistent with the Commission's 2025 proposal, a provider can demonstrate compliance by conducting testing that validates its interoperability.³³ Such testing need not be burdensome or overly prescriptive; certification should take the form of an attestation under penalty of perjury by a certifying

³⁰ See, e.g., *NG911 Transition Order* ¶¶ 30-32, 45 (“We find that requiring that the commonly accepted standards be developed and approved by an accredited standards development organization will help ensure that there is a minimum threshold for ensuring the integrity and validity of such standards, as technology continues to evolve over time”). See also, e.g., *Wireless Emergency Alerts; Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System*, Second Report and Order and Second Order on Reconsideration, 33 FCC Rcd 1320 ¶ 14 (2018) (“*WEA Geotargeting Order*”) (recognizing “the urgent public safety benefits of enhanced geo-targeting” while recognizing that the requirement it adopts “will necessitate completion of ongoing standards development”); *Implementation of the National Suicide Hotline Act of 2018*, Fourth Report and Order, 40 FCC Rcd 5629 ¶ 41 (2025) (finding that, although work to develop technical solutions was ongoing, implementation would be technically feasible within the compliance timeframes adopted in that order).

³¹ Cf. *WEA Geotargeting Order* ¶ 14. We disagree with Intrado to the extent it suggests that a Commission-led task force may be necessary. See Intrado Comments at 10 n.17. Such issues can be addressed by standards development organizations.

³² The Commission has previously proposed an interoperability certification requirement. See *2025 Further Notice* ¶ 72 (proposing to require that Covered 911 Service Providers certify whether their interstate interconnecting ESInet facilities achieve interoperability for exchanged 911 traffic sufficiently to enable complete interstate transfers between ESInets). 14Actual achievement and implementation of interoperability do not depend solely upon NG911 service providers, so we would limit certification to actions within the NG911 service providers' control.

³³ See *2025 Further Notice* at Appendix A § 9.19(c)(4)(i) (“A covered 911 service provider shall certify whether its interstate interconnecting ESInet facilities *achieve* interoperability for exchanged 911 traffic, as defined in section 9.28, sufficiently to enable complete transfers between ESInets.”) (emphasis added). While the Commission proposed annual testing, we would defer to the provider whether annual testing of a service or product is needed once it has already been shown to comply with the interoperability requirement.

official of the covered NG911 service provider, filed directly with the Commission and supported by retained testing records.³⁴ Public safety agencies should have access to these certifications so that they can have the assurances they need that the equipment and services they purchase comply with FCC interoperability requirements.

III. INTEROPERABILITY TESTING BETWEEN 911 AUTHORITIES COMPLEMENTS AND VALIDATES NG911 INTEROPERABILITY REQUIREMENTS, PERFORMANCE, AND CAPABILITIES.

The *Second Further Notice* invites comment on requiring NGCS and ESInet providers, within three years of the effective date of any interoperability requirements the Commission adopts in the future, to test the transfer of 911 traffic “to facilities in at least two other states and with three similar but different NGCS and ESInet providers.”³⁵ We agree with iCERT and NASNA that 911 Authorities should be able to request that their vendors implement and test interoperability between jurisdictions, through their respective 911 Authorities. We appreciate and endorse their suggestion that such a request should trigger a legal obligation that the service providers work in good faith to implement the requested interoperability arrangement within a reasonable and enforceable timeframe.³⁶ But interoperability testing between 911 Authorities is only one component of true interoperability and should not be treated as a substitute for substantive interoperability requirements. As noted above, limited, jurisdiction-specific interoperability achieved through individual implementations could undermine, not further, the goal of nationwide interoperability by creating uncertainty regarding the capabilities that providers must support³⁷ and by increasing the risk of incompatible deployments. Experience has shown that when ESInets are

³⁴ Compliance should not be conditioned on obtaining certification or accreditation from, or paying fees to, any third party.

³⁵ *Second Further Notice* ¶ 187.

³⁶ iCERT and NASNA Comments at 13-14.

³⁷ *See* Intrado Comments at 6.

deployed in a proprietary manner, they can lack interoperability, negatively impact operations, and require additional spending and resources to implement after-the-fact integrations.³⁸

Once the Commission has established a baseline interoperability requirement and providers have implemented commonly accepted standards that support those capabilities, interoperability testing between 911 Authorities can play a valuable role. Such testing can validate that standards-based implementations function as intended in operational environments and can help identify implementation defects that require correction. But the purpose of testing should be to confirm interoperability, not to determine what interoperability means in the first instance.

IV. CONCLUSION

Accordingly, the Commission should require NG911 service providers to ensure that their services and equipment conform with commonly accepted standards that enable the interoperable exchange of 911 voice, text, data, and multimedia across jurisdictions and providers. The Commission should establish a firm 24-month deadline for providers to achieve and certify compliance with this requirement. Once that substantive baseline is in place, interoperability testing between 911 Authorities can complement the requirement by validating that standards-based implementations perform as intended in operational environments. Prompt action will help prevent incompatible and proprietary deployments

³⁸ See APCO International, *APCO's Definitive Guide to Next Generation 9-1-1* at 11 (2022), <https://www.apcointl.org/technology/next-generation-9-1-1/apcos-definitive-guide-to-next-generation-9-1-1/> (citing CSRIC, *CSRIC VII Report on the Current State of Interoperability in the Nation's 911 Systems* (Mar. 17, 2020), <https://www.fcc.gov/file/18394/download>).

from becoming entrenched and will advance the Commission’s goal of seamless, nationwide NG911 interoperability.

Respectfully submitted,

THE PUBLIC SAFETY NEXT GENERATION 9-1-1 COALITION

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