

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Numbering Policies for Modern Communications	)	WC Docket No. 13-97
	)	
IP-Enabled Services	)	WC Docket No. 04-36
	)	
Telephone Number Requirements for IP-Enabled Service Providers	)	WC Docket No. 07-243
	)	
Numbering Resource Optimization	)	CC Docket No. 99-200
	)	
Framework for Next Generation 911 Deployment	)	PS Docket No. 10-255

**COMMENTS OF APCO INTERNATIONAL**

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following comments in response to the Commission’s Public Notice concerning the above-captioned proceedings.<sup>1</sup>

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 27,000 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), radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

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<sup>1</sup> In the Matter of Numbering Policies for Modern Communications, IP-Enabled Services, Telephone Number Requirements for IP-Enabled Service Providers, Numbering Resource Optimization, Framework for Next Generation 911 Deployment, WC Docket Nos. 13-97, 04-36, 07-243, CC Docket No. 99-200, and PS Docket No. 10-255, *Public Notice*, DA 16-1442 (Wireline Competition Bur. rel. Dec. 22, 2016).

Onvoy Spectrum, LLC (Onvoy) is seeking waiver relief of requirements for initial numbering services in order to continue efforts towards enabling an over-the-top (OTT) mobile 9-1-1 solution.<sup>2</sup> Specifically, Onvoy is developing a new capability for a VoIP app to call 9-1-1 from a data-only or non-voice capable device, meaning not using a CMRS network. APCO is encouraged by Onvoy's efforts, because there is presently no 9-1-1 solution for such OTT mobile applications, and Onvoy appears to be addressing a number of important 9-1-1-related considerations. Accordingly, APCO believes it is in the public interest for the Commission to grant appropriate waiver relief to enable Onvoy to continue to pursue further testing of its OTT VoIP 9-1-1 solution.

APCO generally supports development of innovative 9-1-1 solutions that accommodate existing 9-1-1 infrastructure and meet the operational needs of PSAPs, among other considerations.<sup>3</sup> However, it is essential that the general public understands that traditional, CMRS-based voice calls are the superior means for reaching 9-1-1, and should be made whenever possible. Onvoy acknowledges this by stating that its OTT VoIP 9-1-1 call solution "would not be a substitute for the existing 9-1-1 system using smartphones and other connected devices" and "would not bypass the native 9-1-1 device capability that is available," i.e. of devices that are connected to a cellular network.<sup>4</sup> Rather, Onvoy's proposed solution has the potential to provide a tool for OTT VoIP 9-1-1 calls to reach PSAPs if a CMRS voice call is not an option.

Onvoy also describes that it has developed a method for call routing, location identification, and delivery that fits within the existing wireless 9-1-1 framework, including the

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<sup>2</sup> Petition of Onvoy Spectrum, LLC for Waiver, WC Docket No. 13-97 et al. (filed Dec. 19, 2016) ("Petition").

<sup>3</sup> See "The Status of 9-1-1 Apps," APCO International (Apr. 27, 2015) available at [http://appcomm.org/wp-content/themes/directorypress/thumbs/WhitePaper\\_911Apps.pdf](http://appcomm.org/wp-content/themes/directorypress/thumbs/WhitePaper_911Apps.pdf).

<sup>4</sup> Petition at 4.

current equipment and procedures in place at PSAPs.<sup>5</sup> In addition, Onvoy has conducted trials of its OTT VoIP solution, and states that “[f]rom the PSAP operator’s perspective, the call flow was indistinguishable from a normal Phase II Wireless emergency call (other than real-time location data instead of tower information) and the PSAP operator did not need to take any steps beyond normal call processing to handle the emergency call.”<sup>6</sup> Onvoy desires to conduct additional testing.<sup>7</sup>

Based on its representations, Onvoy’s efforts appear to be very promising and APCO would like to see its work continue, particularly further trials and testing.<sup>8</sup> Accordingly, APCO supports grant of waiver relief to enable Onvoy to continue trials and testing of its OTT VoIP 9-1-1 solution.

Respectfully submitted,

APCO INTERNATIONAL

By: /s/

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<sup>5</sup> *Id.* at 4-7.

<sup>6</sup> *Id.* at 7.

<sup>7</sup> *Id.* at 7-8.

<sup>8</sup> Eventually, APCO would look forward to working with Onvoy and the Commission to develop an appropriate regulatory structure, patterned after CMRS, to govern the provision of 9-1-1 service by VoIP application providers or developers.