

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

In the Matter of)	
)	
Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications)	PS Docket No. 11-153
)	
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 Public Safety and Homeland Security Bureau’s Public Notice seeking comment on the request of the State of Maine Public Utilities Commission to address demarcation issues related to the implementation of text-to-911 via message session relay protocol.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 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), emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

The Bureau seeks comment on the appropriate demarcation point between wireless providers and the State of Maine’s network to appropriately assess costs for provision of text-to-911 and whether any demarcation point identified for text-to-911 could be applied to multimedia

¹ Public Safety and Homeland Security Bureau Seeks Comment on Request of the State of Maine Public Utilities Commission to Address Demarcation Issues Related to the Implementation of Text-to-911 Via Message Session Relay Protocol, PS Docket Nos. 11-153, 10-255, *Public Notice*, DA 17-31 (Public Safety and Homeland Security Bur. rel. Jan, 9, 2017).

communication in the NG9-1-1 environment.² As a preliminary matter, it is unclear whether the record contains sufficient information for a thorough analysis of the issues raised in the Public Notice. Without more detail, it may prove difficult for the Commission to draw well-reasoned conclusions, both for SMS text-to-911 and especially for a fully-functional NG9-1-1 environment.³ Here, APCO offers initial considerations based on its understanding of the issues.

In concept, and consistent with the Commission's reasoning in the King County letter, the demarcation point should be the functional element designated by PSAPs for receiving communications to 9-1-1 from telecommunications carriers and forwarding the communications to the particular PSAP that services the caller's area. Thus, as Maine described its ESInet session border controller (SBC), it seems the SBC ingress should be the demarcation point in this case.⁴ To ensure comprehensive applicability across network designs and naming conventions, the Commission might benefit from considering the need for a functional definition of the demarcation point, rather than identifying a specific piece of equipment or network element.

In addition to the question of where the demarcation point lies, Maine's request raises the issue of how the technology for providing text-to-911 to a PSAP via IP is selected.⁵ APCO is sensitive to the importance and complexity of this issue, which seems related to, but not necessarily dependent on establishing the demarcation point, and looks forward to reviewing the comments in this proceeding.

² *Id.* at 2.

³ The deployment of a state ESInet does not, by itself, mean that the transition to NG9-1-1 is complete for the state. A fully functional NG9-1-1 system requires completion of consensus-based, accredited standards and must include not only fully interoperable IP-based connectivity but other data capabilities and equipment within the PSAP to properly and seamlessly report, archive, and further transmit data between the PSAP and first responders.

⁴ Letter of Maria P. Jacques, ENP, Director, Maine Emergency Services Communication Bureau, to David G. Simpson, Chief, Public Safety and Homeland Security Bureau, FCC, 1-2 (filed Nov. 16, 2016) (Maine Letter), available at https://ecfsapi.fcc.gov/file/111789902143/Text_IPConnectivityDemarcationPoint_ME.pdf.

⁵ *Id.* (describing disagreement as to whether Multiprotocol Label Switching (MPLS) or a Virtual Private Network (VPN) is the preferred method by text control center (TCC) providers and the ability for wireless carriers to provide a Session Initiation Protocol (SIP) message complete with location directly to the state's network).

Respectfully submitted,

APCO INTERNATIONAL

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