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

Re: Notice of *Ex Parte*, PS Docket Nos. 07-114, 18-261, 17-239, 15-91, 15-94, 11-60, ET Docket No. 18-295, GN 17-183

On April 18, Mark Reddish, Cole Blum, and I met with David Furth and Michael Wilhelm of the Public Safety and Homeland Security Bureau to discuss APCO's perspective on several ongoing proceedings. As summarized below, APCO reiterated its primary concerns related to issues including public safety spectrum, 9-1-1 location information, Wireless Emergency Alerts (WEA), and the Wireless Resiliency Cooperative Framework.

In regard to spectrum issues, APCO expressed its concern over spectrum sharing proposals in bands that could affect public safety communications, including 6 GHz. As discussed in previous comments,¹ APCO understands the interest in expanding opportunities for unlicensed spectrum, but it is critical that public safety communications remain free from interference. Public safety relies on the 6 GHz band for fixed point-to-point microwave links essential to public safety services and mobile and air-to-ground public safety operations. Public safety bands are simply not suitable for unproven spectrum sharing methods.

Addressing 9-1-1 location accuracy, APCO reiterated support for the Commission's consideration of requiring dispatchable location information for all 9-1-1 calls, regardless of technological platform,² and concern over the proposed z-axis (vertical) location accuracy requirements for wireless calls.³ A z-axis metric of plus-or-minus 3 meters delivered in terms of height above sea or ground level is not actionable for Emergency Communications Centers. Carriers should be required to deliver dispatchable location information or, as a backstop, z-axis information in terms of a floor number.

¹ Comments of APCO, ET Docket No. 18-295, GN Docket No. 17-183 (filed Feb. 15, 2019).

² Comments of APCO, PS Docket Nos. 18-261, 17-239 (filed Dec. 10, 2018).

³ Comments of APCO, PS Docket No. 07-114 (filed Oct. 1, 2018).

APCO expressed appreciation for the Commission's work to improve emergency alerts. APCO remains supportive of enhancing WEA, including by requiring support for multimedia content.⁴ An approach to enhancing WEA that ensures alerting capabilities keep pace with wireless network upgrades seems particularly beneficial in light of the Public Safety and Homeland Security Bureau's recent report on the nationwide WEA and EAS test, which indicated significant inconsistency in alert delivery and receipt.⁵

Finally, on the topic of the Wireless Resiliency Cooperative Framework, APCO reiterated its concern that ECCs lack useful contact information for carriers and effective situational awareness of network outages.⁶ The responsibility to establish and maintain a carrier-ECC contact database rests with the carriers, and they should provide actionable outage information to ECCs so public safety agencies can easily assess the problem and immediately take steps to mitigate the impact.

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):
David Furth
Michael Wilhelm

⁴ Comments of APCO International, PS Docket Nos. 15-91, 15-94 (May 29, 2018).

⁵ Report: October 3, 2018 Nationwide WEA and EAS Test, PS Docket Nos. 15-91, 15-94 (Apr. 8, 2019).

⁶ Comments of APCO International, PS Docket No. 11-60 (Jul. 16, 2018).