

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Reliability and Continuity of Communications) PS Docket No. 11-60
Networks, Including Broadband Technologies)

REPLY COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials-International, Inc. (APCO)¹ submits the following reply comments in response to the Public Notice in the above-captioned proceeding.² The Bureau seeks feedback on the implementation and effectiveness of the Wireless Resiliency Cooperative Framework (Framework).³

The Framework has fallen short of expectations for improving public safety awareness regarding service and restoration status, particularly with regard to 9-1-1 Emergency Communications Centers (ECCs).⁴ APCO was initially hopeful that the Framework would benefit ECCs and lead to improvements to wireless network resiliency, restoration, and overall preparedness and response.⁵ ECCs play a critical role in communicating with the public and field responders before, during, and after emergencies. To serve this role more effectively, ECCs

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 31,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including 9-1-1 Emergency Communications Centers, emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

² Public Safety and Homeland Security Bureau Seeks Comment on Improving the Wireless Resiliency Cooperative Framework, PS Docket No. 11-60, *Public Notice*, DA 19-242 (Public Safety and Homeland Security Bur. rel. Apr. 1, 2019) (“Notice”).

³ *Id.* at 2.

⁴ See Ex Parte Letter of AT&T, Sprint, U.S. Cellular, CTIA, T-Mobile, & Verizon, PS Docket Nos. 11-60, 13-239 (filed Apr. 27, 2016) (“Framework”).

⁵ Comments of APCO, PS Docket Nos. 13-239, 11-60, at 3 (filed May 31, 2016).

need access to up-to-date service provider contact information and timely, actionable information about network outages. Unfortunately, the carriers have failed to take the needs of ECCs and 9-1-1 into account.⁶ Despite the carriers' commitments, the Framework has not produced meaningful benefits for ECCs. Commission action is needed to ensure the carriers establish a carrier-ECC contact database and provide ECCs with timely and actionable situational awareness of network outages.

I. The Commission Should Require the Wireless Carriers to Establish a Carrier-ECC Contact Database

As the Bureau notes, the carriers have committed to providing relevant up-to-date contact information for a carrier-ECC contact database.⁷ Public safety still does not have what it needs. The Framework was announced over three years ago, and the carriers have yet to even establish the format of the database. A carrier-ECC contact database would be beneficial for both carriers and ECCs. During emergencies, there are few resources as essential and basic as knowing who to call when there is a service problem, and in some cases ECCs are the first to learn of network outages. APCO has repeatedly called for the carriers to make good on their commitment, but at this point Commission action is needed.⁸ The Commission should set a deadline for the carriers and make clear that it is their responsibility to promptly establish, maintain, and make available

⁶ See Framework at 3. While the carriers committed to developing best practices to facilitate coordination before, during, and after emergencies and disasters with input from public safety subject matter experts, the resulting best practices failed to address the needs of 9-1-1 or ECCs. See CTIA, Best Practices for Enhancing Emergency and Disaster Preparedness and Restoration, available at <https://api.ctia.org/docs/default-source/default-document-library/best-practices-for-enhancing-emergency-and-disaster-preparedness-and-restoration.pdf>.

⁷ Notice at 6; see also Framework at 3.

⁸ See Ex Parte Letter of APCO, PS Docket Nos. 07-114, 18-261, 17-239, 15- 91, 15-94, 11-60, ET Docket No. 18-295, GN Docket No. 17-183, at 2 (filed Apr. 22, 2019); Ex Parte Letter of APCO, PS Docket No. 15-80, ET Docket No. 04-35, at 1 (filed Nov. 13, 2018); Comments of APCO, PS Docket No. 11-60, at 2-4 (filed Jul. 16, 2018); Comments of APCO, PS Docket No. 17-344, at 4-5 (filed Jan. 22, 2018); Ex Parte Letter of APCO, PS Docket No. 17-68, at 1 (filed Apr. 10, 2017); Comments of APCO, PS Docket Nos. 13-239, 11-60, at 4 (filed May 31, 2016).

to ECCs a secure database to ensure that ECCs know who to contact in the event of an outage and for carriers to promptly notify ECCs of known and suspected outages.⁹

II. ECCs Need Timely, Actionable Information About Outages

The data that the carriers have committed to provide through the Commission's Disaster Information Reporting System (DIRS) can be helpful for some purposes but do not meet ECCs' operational needs. APCO has continually emphasized that ECCs and the public safety agencies they interact with would benefit from receiving granular, real-time situational awareness of outages.¹⁰ Whereas consumers are kept informed with detailed outage maps and other information from utility companies and Internet service providers, ECCs are left in the dark when service outages impact the ability of the citizens they serve to reach 9-1-1. When a carrier network outage occurs, ECC directors frequently are limited to social media and ad hoc communications with their peers to discern what might be happening in carrier networks. This is an unacceptable situation and limits ECCs' ability to communicate vital information to the public about how to get help, especially in the event of wide-scale emergencies. The carriers have ignored repeated requests to provide actionable information about network outages in a format that ECCs could use to easily assess the impact on their communities.

It is now time for the Commission to make clear to carriers that ECCs should receive outage information in an easily accessible format that provides situational awareness with regard

⁹ Further, as APCO has said previously, the information in the database should not be monetized, and the carriers should be responsible for ensuring that the database is secure and only used for legitimate purposes. Comments of APCO, PS Docket No. 11-60, at 3 (filed Jul. 16, 2018).

¹⁰ See Ex Parte Letter of APCO, PS Docket Nos. 07-114, 18-261, 17-239, 15- 91, 15-94, 11-60, ET Docket No. 18-295, GN Docket No. 17-183, at 2 (filed Apr. 22, 2019); Ex Parte Letter of APCO, PS Docket No. 15-80, ET Docket No. 04-35, at 1 (filed Nov. 13, 2018); Comments of APCO, PS Docket No. 11-60, at 1-2 (filed Jul. 16, 2018); Comments of APCO, PS Docket No. 17-344, at 4-5 (filed Jan. 22, 2018); Ex Parte Letter of APCO, PS Docket No. 17-68, at 1-2 (filed Apr. 10, 2017); Comments of APCO, PS Docket Nos. 13-239, 11-60, at 4-5 (filed May 31, 2016); Ex Parte Letter of APCO, PS Docket Nos. 13-239, 11-60, at 1 (filed Oct. 9, 2015); Comments of APCO, PS Docket Nos. 13-239, 11-60, at 2-3 (filed Jan. 17, 2014); Comments of APCO, PS Docket Nos. 13-75, 11-60, at 3-5 (filed May 13, 2013); Comments of APCO, PS Docket No. 11-60, at 3-5 (filed Aug. 17, 2012).

to the timing, nature, and scope of any impacts to communications with ECCs.¹¹ 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. This information would allow ECCs to easily assess problems that occur and immediately take steps to mitigate the impact. For example, ECCs could use such information to recommend where to deploy resources in an affected area and to provide information to responders and the public regarding outages and restoration efforts.¹²

III. Conclusion

The Commission's decision to forgo further regulations to improve wireless resiliency in 2016 was based in part on the carriers' voluntary Framework, including their commitment to "establishing a provider/PSAP contact database."¹³ The voluntary approach has failed. The Commission should require the wireless carriers to establish and maintain a secure carrier-ECC contact database with a specific deadline and to provide outage information to ECCs 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. These improvements should not be limited, as envisioned in the Framework, to state Emergency Operations Centers (EOCs) or activation of ESF-2. Even during

¹¹ This would be consistent with the CTIA Best Practices, if amended to correct the omission of references to ECCs: "outage and restoration information is crucial to emergency responders who need to determine where to deploy critical resources. Wireless providers should develop communications procedures to share information about outages and service restoration activities with local governments and emergency responders during and after an emergency or disaster." CTIA, Best Practices for Enhancing Emergency and Disaster Preparedness and Restoration, at 4, available at <https://api.ctia.org/docs/default-source/default-document-library/best-practices-for-enhancing-emergency-anddisaster-preparedness-and-restoration.pdf>.

¹² Additionally, if ECCs have timely situational awareness of outages, they could activate outreach programs or emergency response plans in order to advise stakeholders in the accessibility community that an alternate method of contacting 9-1-1 might be necessary. See Comments of Consumer Groups, PS Docket No. 11-60 (filed Apr. 29, 2019).

¹³ See Improving the Resiliency of Mobile Wireless Communications Networks, Including Broadband Technologies, Order, 31 FCC Rcd 13745, at paras. 1, 5, 11 (2016).

major disasters, EOCs might not be activated, but ECCs are always operational.¹⁴ Further, as APCO has pointed out, ECCs should be able to benefit from the contact database and situational awareness information regardless of whether a disaster has reached a certain threshold or EOCs have been activated.¹⁵

Respectfully submitted,

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¹⁴ Indeed, 9-1-1 public safety telecommunicators often remain at their posts for days while their own homes and families are impacted.

¹⁵ Comments of APCO, PS Docket Nos. 13-239, 11-60, at 4 (filed May 31, 2016).