

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

In the Matter of )  
 )  
Authorizing Permissive Use of the “Next ) GN Docket No. 16-142  
Generation” Broadcast Television Standard )

**REPLY COMMENTS OF APCO INTERNATIONAL**

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following reply comments in response to the Commission’s Notice of Proposed Rulemaking in the above-captioned proceeding.<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), emergency operations centers, radio networks, and information technology—for law enforcement, fire, emergency medical, and other public safety agencies.

APCO members collectively represent one of the largest groups of state and local alert originators authorized to issue emergency alerts and warnings. Thus, APCO offers the following comments limited to the potential public safety benefits of the Commission’s proposal to “authorize television broadcasters to use the ‘Next Generation’ broadcast television transmission

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<sup>1</sup> In the Matter of Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard, GN Docket No. 16-142, *Notice of Proposed Rulemaking*, FCC 17-13 (rel. Feb. 24, 2017) (“NPRM”).

standard associated with recent work of the Advanced Television Systems Committee (ATSC 3.0).”<sup>2</sup>

The Commission seeks comment on the enhanced capabilities that may be available through the use of ATSC 3.0 transmissions, including an advanced Emergency Alert System (EAS).<sup>3</sup> In the NPRM, the Commission describes assertions of commenters and petitioners on the record supporting the use of the ATSC 3.0 standard that, among other things, it will enable broadcasters to offer enhanced and innovative technologies and services to consumers, including an advanced EAS with capabilities such as geo-targeting of emergency alerts to tailor information for particular communities, enhanced datacasting to provide videos, photos, maps, floorplans, and other critical data to public safety users, and the ability to “wake up” receivers to alert consumers to sudden emergencies and disasters, such as tornadoes and earthquakes.<sup>4</sup>

Commenters to the NPRM reassert the potential of these advanced EAS capabilities and offer additional public safety benefits such as the ability to transmit alerts to mobile and handheld devices and connected vehicles, deliver alerts to enabled devices even if the Internet or cellular networks are not available or functional, and personalize of alerts.<sup>5</sup>

APCO generally supports leveraging new technologies to complement or enhance the EAS and Wireless Emergency Alert (WEA) systems.<sup>6</sup> Effective geo-targeting of EAS messages would promote greater trust of emergency alerts, reduce alert fatigue, avoid unnecessary concern to unaffected parties, and lessen inquiries to PSAPs from members of the public who are located

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<sup>2</sup> *Id.* at para. 1.

<sup>3</sup> *Id.* at para. 69.

<sup>4</sup> *See id.* at paras. 4, 69.

<sup>5</sup> *See* Comments of AWARN Alliance, GN Docket No. 16-142, at 1-3 (filed May 9, 2017); Comments of Nexstar Broadcasting, Inc., GN Docket No. 16-142, at 2-3 (filed May 9, 2017); Comments of Raycom Media, Inc., GN Docket No. 16-142, at 2 (filed May 9, 2017); Comments of Tenga, Inc., GN Docket No. 16-142, at 2-3 (filed May 9, 2017); Comments of Lokita Solutions, RTP Holdings, GN Docket No. 16-142, at 2-4 (filed May 9, 2017).

<sup>6</sup> Comments of APCO, PS Docket No. 15-91 (filed Dec. 8, 2016); Comments of APCO, PS Docket Nos. 15-94, 15-91 (filed June 8, 2016); Comments of APCO, PS Docket No. 15-91 (filed Jan. 13, 2016).

outside of the impacted area yet receive the alert. The ability to accurately target alerts would also allow emergency managers and responders to better ensure that the right segments of the population are provided the information or direction they need to be safe. Additionally, providing the public with multimedia alerts containing more detailed emergency information can help reduce milling behavior and duplicative 9-1-1 calls. Further, the ability to “wake up” sleeping devices and provide alerts to mobile and handheld devices, even if cellular service is down, could serve an important function to promote timely response and redundancy during emergencies.

Finally, APCO notes the importance of coordination of a next generation EAS system with legacy EAS and WEA systems. APCO has previously urged the Commission to adopt an approach that aims to harmonize its respective policies on EAS and WEA while accounting for differences in the platforms.<sup>7</sup> Regardless of which system is used, the experience for PSAPs and the public should be as uniform as possible.

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<sup>7</sup> Comments of APCO, PS Docket Nos. 15-94, 15-91, at 2 (filed June 8, 2016). AWARN Alliance also recognizes the need for coordination among different alerting systems. *See* Comments of AWARN at 8-10.

APCO is encouraged by the prospect of leveraging the ATSC 3.0 standard to enhance the EAS, and looks forward to further exploration of the public safety benefits.

Respectfully submitted,

APCO INTERNATIONAL

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