

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

In the Matter of )  
 )  
Amendment of Part 11 of the Commission’s Rules ) PS Docket No. 15-94  
Regarding Emergency Alert System )

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following 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), dispatch centers, emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies. APCO is one of the law enforcement stakeholders that serves on the Department of Justice’s Blue Alerts Advisory Group.

APCO supports the Commission’s proposal to create a dedicated Emergency Alert System (EAS) event code for Blue Alerts. Such a code would improve the effectiveness of the National Blue Alert Network and facilitate the integration of Blue Alert plans nationwide.

APCO agrees with the proposal that such alerts would be confined to those areas most likely to

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<sup>1</sup> Amendment of Part 11 of the Commission’s Rules Regarding the Emergency Alert System, PS Docket No. 15-94, *Notice of Proposed Rulemaking*, FCC 17-74 (rel. Jun. 22, 2017) (“NPRM”).

facilitate capture of the suspect.<sup>2</sup> As APCO has previously noted, effective geo-targeting is important to preserve the public's trust in emergency alerts and is helpful for PSAPs to lessen inquiries from members of the public who are located outside of the impacted area yet receive the alert.<sup>3</sup> APCO also supports the Commission's exploration of the interplay between EAS and Wireless Emergency Alerts (WEA)<sup>4</sup> and continues to urge 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>5</sup>

APCO appreciates the Commission's efforts to improve public safety alerting and looks forward to continued enhancements.

Respectfully submitted,

APCO INTERNATIONAL

By: /s/

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<sup>2</sup> *Id.* at para. 7.

<sup>3</sup> Comments of APCO, PS Docket No. 15-91, at 7-8 (filed Jan. 13, 2016).

<sup>4</sup> *NPRM* at paras. 19-20.

<sup>5</sup> Comments of APCO, PS Docket No. 15-91, at 2 (filed Jun. 8, 2016).