



AMERICAN PUBLIC WORKS ASSOCIATION

Your Comprehensive  
Public Works Resource

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July 13, 2018

Ms. Marlene H. Dortch  
Secretary-Office of the Secretary  
FCC Headquarters  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

Re: PS Docket No. 11-60-Network Resiliency Cooperative Framework and study on  
public access to 911 services during emergencies;

ATTN: Ms. Dortch:

On behalf of the more than 30,000 members of the American Public Works Association (APWA), we appreciate the opportunity to submit comments to the Federal Communication Commission's (FCC) Public Safety and Homeland Security Bureau (PSHSB) on the Network Resiliency Cooperative Framework. APWA includes not only personnel from local, county, state/province, and federal agencies, but also private sector personnel. Public works agencies depend on a reliable interoperable emergency communications system that connects them to other responders, including law enforcement, fire, emergency medical professionals, and other public works agencies during response and recovery operations.

Our members take this responsibility very seriously and are constantly looking for avenues to submit constructive input as to how our emergency communications can be improved at the local, state, and federal levels. In an emergency situation public works professionals are often the first to arrive and the last to leave.

Disasters, either man-made or natural, regularly require a public work presence on the scene of an emergency or at a minimum, require public works personnel are in constant communication with other first responders to coordinate the removal of debris, maintaining power and transportation of equipment.

As you know, first responders rely on effective communications during emergency situations. APWA has likewise placed a major emphasis on emergency management as highlighted in our Emergency Management Public Policy Priority document for the 115<sup>th</sup> Session of Congress (attached), which includes ensuring communications support across sectors and platforms.

With respect to the NRCF, reliable communication systems are certainly very important. As you are aware, the Department of Homeland Security (DHS) has recognized the role of public works as first responders, as such, public works professionals depend on the NRCF and reliable access to 911 services during disasters. When collecting data and revising standards for the NRCF and 911

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services, we would advocate strongly that public works professionals be consulted and included with all first responders when seeking input on federal policies that impact emergency communications.

Like other first responders during the 2017 hurricane and wildfire season, public works professionals in many cases were called upon to be the first on the scene and likewise the last to depart following the disaster. From start to finish of these disasters, public works professionals were counted on to maintain constant communication with other first responders.

APWA looks forward to continuing to work with the FCC and the PSHSB to share information with our membership as well as provide comments on proposed federal regulation and rulemaking. Our members pride themselves on being committed to public service by profession and being a resource for federal initiatives is just another way we work to protect our communities. If APWA may be of further assistance, please contact Marty Williams, APWA Government Affairs Manager, at [mwilliams@apwa.net](mailto:mwilliams@apwa.net) or 202-218-6732.

Thank you for your time and consideration of these comments.

Sincerely,

A handwritten signature in black ink, reading "Scott D. Grayson". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Scott D. Grayson  
Executive Director  
American Public Works Association