September 7, 2018

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of Ex Parte, PS Docket No. 13-75

September 5, Mark Reddish and Nicole Zimbelman met with representatives of the Public Safety and Homeland Security Bureau. The primary purpose of the meeting was to discuss the definition of “covered 9-1-1 service provider.” APCO reiterated its position, as filed in the record, that the Commission should consider expanding the definition to ensure that any service intended for use during emergencies meets a minimum level of reliability. In some cases, entities without a direct relationship to a PSAP have found methods to impact the ALI, routing, or supplemental data relevant to a 9-1-1 call. The Commission should explore these issues further and if appropriate take action to ensure reliability for 9-1-1 without discouraging entities from providing helpful solutions for public safety.

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):
Guy Benson
Jennifer Holtz
David Plotinsky
John Healy