

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
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Use of N11 Codes and Other )  
Abbreviated Dialing Arrangements )  
 )  
Request of the Department of Justice )  
that 311 Be Reserved for Community Use )  
for Non-Emergency Police Telephone Calls )

CC Docket No. 92-105

To: The Commission

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COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. ("APCO"), hereby submits the following comments in reply to the Commission's Public Notice (DA 96-1500) seeking comments regarding the U.S. Department of Justice ("DOJ") letter highlighted in the above-captioned proceeding. The DOJ letter requests the reservation of a national "3-1-1" access number to be used by communities for "non-emergency police telephone calls."<sup>1</sup>

APCO, founded in 1935, is the nation's oldest and largest public safety communications organization. APCO's over 12,000 members are involved in the management and operation of police, fire, emergency medical and other public safety communications facilities throughout the nation, including Public Safety Answer Points ("PSAPs") charged with answering and responding to 9-1-1 calls. Through its APCO Institute, APCO also develops and implements training programs for 9-1-1 center personnel.

<sup>1</sup> Letter of Joseph E. Brann, Director of Department of Justice, Office of Community Oriented Policing Services, to Regina Keeney, Chief, Common Carrier Bureau, August 26, 1996.

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APCO supports FCC reservation of 3-1-1 for possible use as a non-emergency number for public safety agencies. To the extent that there is a three-digit number used for non-emergency calls, there are benefits to that number being uniform to avoid public confusion. However, APCO has a number of important concerns which we hope the Commission, DOJ, and others involved with this issue will take into consideration before proceeding to implement a three-digit non-emergency number. APCO had previously sent a letter to the President, the Attorney General, and the Chairman of the FCC raising some of these issues. APCO's letter, dated August 21, 1996, has been included as part of the record in this proceeding.

Throughout the United States, there are existing 9-1-1 and seven digit numbers that are currently used for emergency and general business access to public safety services. These numbers are well publicized and readily available to the public. Therefore, it is not clear that a separate non-emergency number is necessary. A more important problem is that, while most telephones have access to 9-1-1, it is not yet universal. APCO would hope that legislatures, regulatory bodies, and emergency service managers will concentrate on the completion of a universal 9-1-1 system before adding additional three-digit numbers.

Implementation of 3-1-1 as contemplated by DOJ would also be complicated by the fact that the wireless revolution is causing substantial changes in the way emergency and non-emergency numbers will be accessed by the public. The development of wireless location technology is in its infancy with 9-1-1 services, and while efforts are in place to move that action forward (see CC Docket 94-102), the addition of another number right now will certainly cause problems in this process. If industry and government leaders concentrate their current efforts on 9-1-1 service delivery, the 3-1-1

issue will be a natural migration for the next level of service.

APCO also notes that it is state and local governments which are required to support and manage the 9-1-1 centers. They are responsible for implementation and maintenance of the services which occur at these centers. A new three-digit number requires consideration of the routing, database, and telecommunications services necessary to provide the service. APCO is concerned how state and local governments will be able to address these considerations if a new non-emergency three-digit number is initiated.

The staffing of emergency response centers is another very important issue to APCO's members. These centers are constantly under the gun to provide increased service. Yet, the addition of another emergency number without the addition of staff resources to answer calls may become a serious problem for the centers. Implementing another N11 number to separate non-emergency calls will not alleviate the problem of having the network and personnel trained and ready to answer them.

APCO is also concerned with the mechanism that will be required to fund the installation of any additional three-digit service. As previously mentioned, implementing any additional service will require state and local governments to purchase new equipment and hire more individuals to operate call centers. The burden that will be placed on these agencies to support the service will demand some new method of funding, which has yet to be identified.

Finally, 9-1-1 is the most recognized number by the public to obtain emergency assistance from police, fire and emergency medical services. This service should certainly be kept for "true emergencies." A new non-emergency number might help to retain the emergency nature of 9-1-1. However, APCO is concerned that adding another public safety N11 calling number could dilute public recognition of 9-1-1 as the number for emergency use. The public could be easily confused by

there being two N11 numbers for reaching public safety agencies. Care must be taken that a plan intended to help 9-1-1 does not have the unintended consequence of confusing the public and undermining the effectiveness of 9-1-1.

**CONCLUSION**

While APCO encourages the reservation of an additional three-digit number for possible non-emergency use, we hope the Commission, DOJ, and others will evaluate the considerations discussed above before implementing 3-1-1 as a non-emergency number. Indeed, APCO suggests that there be a national study committee established to examine this issue, and that it include representatives from APCO and other public safety organizations.

Respectfully submitted,

**ASSOCIATION OF PUBLIC-SAFETY  
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