



**EXECUTIVE DIRECTOR
CHIEF EXECUTIVE OFFICER**

Derek K. Poarch
poarchd@apointl.org

HEADQUARTERS

J. Rhett McMillian, Jr. Building
351 North Williamson Boulevard
Daytona Beach, FL 32114-1112
386-322-2500

EXECUTIVE OFFICES

Gregory T. Riddle Building
1426 Prince Street
Alexandria, VA 22314
571-312-4400

www.apointl.org

**BOARD OF DIRECTORS
2015 – 2016**

EXECUTIVE COMMITTEE

President

Brent Lee
w.brent.lee@gmail.com

First Vice President

Cheryl J. Greathouse
cgreathouse@gpstc.org

Second Vice President

Martha K. Carter
mcarter@caddo911.com

Immediate Past President

John Wright
rfanalyst@gmail.com

East Coast Region

Richard C. Boettcher, RPL
James J. McFarland

Gulf Coast Region

Tracey M. Hilburn, RPL
Matthew J. Stillwell, RPL, ENP

North Central Region

Robin Tieman, RPL
Holly E. Wayt, RPL, ENP

Western Region

Kimberly D. Burdick, RPL, ENP
Margie Moulin, RPL

Commercial Advisory Council

Richard R. Solie

October 9, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: PS Docket No. 13-239; PS Docket No. 11-60

Dear Ms. Dortch,

On October 8, 2015, Jeff Cohen, Mark Reddish, and Max Hsu of the Association of Public-Safety Communications Officials (APCO) International held a conference call with Jeff Goldthorp, John Healy, Mike Saperstein, Renee Roland, John Sawyer, and Holly Rocco of the Public Safety and Homeland Security Bureau to discuss the above-referenced proceedings.

APCO described the kind of outage information that would be useful to public safety answering points (PSAPs), noting that it differs from what could be of value to consumers. APCO suggested that specific, timely situational awareness information would be of much greater value than reports on what steps providers have taken to improve reliability and resiliency. Further, it would be useful for PSAPs to have this information in a format that can be used to easily assess the outage area on the PSAP's map system. This may be in the form of coordinate boundaries for the outage area, GIS files, or text information from internal carrier reporting systems that can be input into the PSAP's map and/or CAD systems to provide a visual representation of the affected area. APCO noted that while wireless network outages threaten the public's ability to contact 9-1-1, they also impede emergency alerts and information transmitted via mobile apps. Therefore, it would be valuable for PSAPs to know what kind of outage has occurred (power outage, physical damage, transport network out of service, etc.), the scope of the outage, and estimated repair time.

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