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March 31, 2016

Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: PS Docket No. 08-51 – Call-Forwarding Requirements for Non-Service-Initialized Phones

Dear Ms. Dortch,

On March 29, 2016, Jeff Cohen, Mark Reddish, and Max Hsu of the Association of Public-Safety Communications Officials (APCO) International met with Erin McGrath, Legal Advisor to Commissioner O’Rielly, to discuss the above-captioned proceeding.

APCO reiterated its position that the Commission should sunset its call-forwarding rule and affirmatively prohibit carriers from forwarding 9-1-1 calls made from non-service-initialized (NSI) handsets, following an appropriate transition period. APCO noted that the problem of fraudulent and accidental 9-1-1 calls from NSI devices only continues to grow.

Regarding proposed solutions that rely on call-blocking or a third-party intercept, APCO expressed concerns about the potential complexities and challenges that would be involved, further illustrating that a sunset and prohibition are overdue and the best path forward.

APCO added that to the extent service providers continue to favor intercept options or express liability concerns, it would be very helpful if the industry provided additional information for the record to identify the existing populations that continue to depend upon NSI devices as their only option for making a wireless 9-1-1 call; the availability of low-cost alternatives that would have the additional benefit of providing vulnerable populations with location, call-back number, and texting features; and under what circumstances, how frequently, and for what duration service-initialized devices may temporarily appear as NSI.

Finally, APCO stressed that the focus of the proceeding should remain on quickly solving the severe and growing public safety problem presented by abusive and fraudulent use of NSI devices to call 9-1-1.

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)
Erin McGrath