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April 15, 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 April 13, 2016, Jeff Cohen, Mark Reddish, Lauren Corcoran, and Max Hsu of the Association of Public-Safety Communications Officials (APCO) International met with David Furth, Michael Connelly, and David Siehl of the Public Safety and Homeland Security Bureau to discuss the above-captioned proceeding.

At the Bureau's request, APCO obtained data from its members on the burdens imposed by non-emergency 9-1-1 calls from non-service-initialized (NSI) devices. Based on the information received, APCO continues to believe that the best way to protect those who depend on NSI phones as their sole option for making wireless 9-1-1 calls is to improve their access to 9-1-1, not to continue providing an inferior option that lacks call-back, location, and texting capabilities. Accordingly, the Commission should affirmatively prohibit carriers from forwarding 9-1-1 calls made from NSI handsets, following an appropriate transition period, and work with the carriers, public safety, and other stakeholders to explore low-cost alternatives that provide access to 9-1-1 with the features benefiting consumers with service-initialized phones.

While the proportion of total calls that come from NSI devices and the proportion of NSI calls that are harassing/non-emergency vary from PSAP to PSAP, there is widespread agreement that the status quo is unacceptable. APCO shared an especially troublesome example in which one PSAP reported that 30% of its 9-1-1 calls are from NSI phones, with only 1% of those calls involving an actual service response. APCO also explained that, the time spent dealing with each call is highly variable, depending on agency policies and the specific actions taken. Investigating harassing NSI callers can take hours, and even legitimate calls that lack call-back and location information may require additional time and resources for an effective emergency response.

APCO noted several impediments to tracking NSI calls that make it difficult to quantify the "costs" and may result in underestimating the burden of the call-

forwarding rule on PSAPs. For example: tracking NSI calls requires additional resources while PSAPs are already strained; computer-aided dispatch systems may not easily track NSI calls; telecommunicators may create a single record for multiple non-emergency NSI calls received in succession; and PSAPs may not be able to identify whether a call is made from an NSI device in certain situations.

Finally, APCO raised concerns with alternatives to prohibiting carriers from forwarding NSI calls to 9-1-1. Call blocking and intercept solutions would introduce delays, even for legitimate calls, and could be easily circumvented by harassing callers. Additionally, a technology-specific solution would result in inconsistent 9-1-1 service, prolong inferior NSI 9-1-1 service, allow the number of NSI devices to continue to grow, and significantly delay a solution to these problematic calls for public safety communications professionals.

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)
David Furth
Michael Connelly
David Siehl