

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matters of)	
)	
Improving the Resiliency of Mobile Wireless Communications Networks)	PS Docket No. 13-239
)	
Reliability and Continuity of Communications Networks, Including Broadband Technologies)	PS Docket No. 11-60
)	

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following comments in response to the Public Notice (Notice) released by the Commission’s Public Safety and Homeland Security Bureau in the above-captioned proceedings.¹ The Notice seeks comment, in light of the aims of the underlying rulemaking proceeding and the associated record, on an announcement by the nation’s largest wireless providers of a voluntary initiative to enhance coordination and communication to advance wireless service continuity and information sharing during and after emergencies and disasters.

Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 25,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including Public Safety Answering Points (PSAPs), dispatch centers, emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

¹ Public Safety and Homeland Security Bureau Seeks Comment on Wireless Carriers’ Proposal to Increase Resiliency and Enhance Information Sharing During Disasters, *Public Notice*, DA 16-463, PS Docket Nos. 13-239 and 11-60, (rel. Apr. 28, 2016), *available at* http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0428/DA-16-463A1.pdf.

The vast majority of calls to 9-1-1 are now from wireless devices, so any wireless network outage has the potential to block life-saving calls for emergency assistance. Further, the general public uses wireless devices to receive emergency alerts, as well as for a growing number of mobile applications providing helpful information and resources during emergencies. Commercial wireless networks, especially broadband networks, are also used by many government officials and some first responders to supplement dedicated public safety communications networks, especially during and following major disasters. Therefore, wireless network outages have a significant impact on the ability of public safety agencies to receive information regarding, and respond to, emergencies.

APCO's comments in this proceeding focused on the needs of PSAPs.² The kind of outage information that would be useful to PSAPs differs from what could be of value to consumers. From a public safety perspective, reporting of specific types of data would be useful concurrent with a disaster or catastrophic event. PSAPs need to be made aware of site and system outages as soon as they occur, ideally through uniform reporting mechanisms.

Disclosing the total number of cell sites out of service would be less valuable than a notification portal or system that provides immediate notification of specific outages. Public safety needs to know where and when a site is not operational, the nature of the outage (physical tower down, power out, antenna out of service, etc.), and expected repair time.

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

² See Comments of APCO International, January 17, 2014, PS Docket 13-239 and 11-60; Letter, dated October 9, 2015, from Jeffrey S. Cohen, Chief Counsel, APCO International, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket Nos. 13-239 and 11-60.

reporting systems that can be input into the PSAP's map and/or CAD systems to provide a visual representation of the affected area.

Here, APCO comments on the Framework as it relates to our positions previously expressed in the record. The Wireless Network Resiliency Cooperative Framework (Framework) can lead to great improvements to wireless network resiliency, restoration, and overall preparedness and response, in disaster situations. The Framework will benefit PSAPs across the country by improving public safety awareness regarding service and restoration status, and providing access to up-to-date contact information. Indeed, we hope this Framework can serve as a model for non-nationwide carriers to follow as well.

APCO's comments focus on two goals that are included in the Framework's prongs: enhancing preparedness and improving awareness of service and restoration status.

I. Enhancing Preparedness

To enhance municipal preparedness and restoration, the Framework contains a commitment to convene with select local government representatives' public safety subject matter experts to develop best practices to facilitate coordination before, during, and after emergencies in order to maintain and restore wireless service continuity. As the nerve centers of emergency response, PSAPs play a critical role in communicating with the public and field responders before, during, and after emergencies. Thus, APCO suggests that PSAPs be among the public safety subject matter experts included in the meetings contemplated by the Framework.

To increase consumer readiness and preparation, the Framework includes a commitment to conduct consumer education designed to ensure that consumers are properly prepared for emergencies. Many PSAPs use PSAs, social media, and other channels for public education on

topics such as when and how to contact 9-1-1. Therefore collaboration with PSAPs would be beneficial as CTIA works with consumer groups to develop consumer readiness checklists and outreach strategies.

II. Improving Awareness of Service and Restoration Status

To improve public safety awareness regarding service and restoration status,

[w]ireless carriers will provide up-to-date contact information for a carrier/PSAP contact database, subject to an agreement by all participating entities that such data be kept confidential. State Emergency Operations Center (“State EOC”) representatives will then be able to address inquiries to the appropriate carrier point of contact. When the NRCC activates ESF-2 and the FCC activates the electronic DIRS for a given emergency or disaster, State EOC inquiries will promptly be relayed to the carrier’s designated representative.³

While the Framework specifically references the ability of State EOCs to access carrier points of contact, the contact list must also be sent to PSAPs for use during disasters. During disasters, EOCs may or may not be activated, but PSAPs are always operational. Further, the contact list must be sent to PSAPs for use during other times, in the event of any wireless outages impacting origination or 9-1-1 networks, whether large-scale or localized, and including disaster-related and “sunny day” outages.

The Framework also includes a commitment for the carriers to support the FCC making DIRS data regarding the total number of cell sites out of service publicly available on its website on an industry-aggregated, county-by-county basis. This information can serve a valuable purpose by adding to the general situational awareness of both the general public and the public safety community. Further, this portion of the Framework could serve as a complement to APCO’s previous comments that specific, timely situational awareness information, in a format

³ Framework at 3.

that can be used to easily assess the outage area on the PSAP's map system, would be of particular value to PSAPs.

Providing PSAPs with timely, targeted information as to the location, severity, and estimated duration of an outage allows them to become more proactive in identifying and recommending resources in the affected area. With up-to-date situational awareness, PSAPs would be able to stage law enforcement, fire/rescue and EMS resources, identify impacted areas in GIS-based CAD systems where available, and provide real time updates to mobile data systems used by responders. This kind of information, combined with the commitments in the Framework, would greatly assist PSAPs with disaster preparation and response.

CONCLUSION

As set forth above, APCO believes the Framework will provide many benefits to public safety during times of disaster, and continues to support additional measures that would lead to improved situational awareness for PSAPs during wireless network outages.

Respectfully submitted,

APCO INTERNATIONAL

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