

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Request of International Bureau for Further) DA 00-2826
Comment Regarding Adoption of 911) IB Docket No. 99-67
Requirements for Satellite Services)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: International Bureau

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") hereby submits the following brief comments in response to a *Public Notice*, DA 00-2826, released December 15, 2000, seeking further comments regarding 9-1-1 requirements for satellite services.

APCO is the nation's oldest and largest public safety communications organization. Most of APCO's over 15,000 individual members are state or local government employees who manage and operate police, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other communications systems that protect the safety of life, health and property. These systems include radio communication operations, telecommunications and information networks, and Public Safety Answering Points (PSAPs). APCO has been a major participant in the Commission's proceedings in Docket 94-102 regarding wireless Enhanced 9-1-1 (E9-1-1) rules. APCO has also filed comments in response to the Commission's previous inquiries regarding potential 9-1-1 rules for satellite services.¹

APCO continues to believe that it is essential for Mobile Satellite Services ("MSS") to provide 9-1-1 capability and, to the extent feasible, E9-1-1. Indeed, E9-1-1 capability may be

¹ *Public Notice* at notes 9-11.

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especially important for MSS as it is likely to be used in remote areas where emergency callers may be unable to describe their precise location. The time for adopting E9-1-1 requirements to address this issue is now, when the MSS industry is still in its infancy, not when the industry has matured and application of E9-1-1 requires extensive replacement or upgrade of imbedded infrastructure and systems.

As discussed in the *Public Notice*, MSS poses some unique issues for 9-1-1 service, due in part to the fact that MSS calls from across the nation will interconnect with the public switched network at only a few points. In that scenario, how will MSS then route 9-1-1 calls to the correct emergency responders? First, the location of the caller must be identified, either through voice communications with an operator (Basic 9-1-1) or with an automatic location capability (E9-1-1); and second, the call must be routed to the appropriate PSAP (or other responder, such as the Coast Guard).

On the first issue, APCO looks forward to the comments from other parties regarding the current state of technology and the feasibility of integrating automatic location information into MSS handsets. The difficulty with relying on operator intervention, even on an interim basis, is that callers may not be able to describe their precise location, especially to a “national” operator unfamiliar with the area in question. The caller may also be lost, in a remote area without clear addresses or landmarks, or injured in such a manner that they cannot provide clear and accurate verbal instructions. Even if the caller is able to describe accurately their location, the national operator is then faced with the task of matching that information with the appropriate PSAP. Obviously, automatic location information integrated with a national PSAP database would provide far more rapid and accurate emergency call processing.

On the second issue, regarding call-routing to the correct PSAP, progress has been made towards the establishment of one or more national PSAP databases, which, when combined with readily available mapping programs, should facilitate rapid and accurate routing of 9-1-1 calls received at central locations.² APCO's understands that National Emergency Number Association ("NENA") and others will provide more specific information in their comments regarding the status of PSAP database development.

CONCLUSION

APCO urges the Commission to move forward in the adoption of appropriate E9-1-1 requirements for MSS and similar satellite technologies.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY
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² In addition to MSS, such a database is necessary for certain national "telematics" services that are currently being developed and implemented.