

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems	)	CC Docket 94-102
	)	
Amendment of Parts 2 and 25 to Implement the Global Mobile Personal Communications) by Satellite (GMPCS) Memorandum of Understanding and Arrangements; et al.	)	IB Docket 99-67

**REPLY COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following brief reply comments to clarify and expand upon its initial comments in response to the Commission’s *Further Notice of Proposed Rulemaking*, FCC 02-326, released December 20, 2002, in the above-captioned proceedings.

In particular, APCO wishes to clarify its position with regard to the application of E9-1-1 rules to telematics and related services. In its initial comments, APCO indicated

that to the degree a device provides a reasonable expectation that it afford access to emergency response, it should be covered by the Commission’s rules. APCO urges the Commission to examine the range of telematics services and establish clearly which of those services meet this standard.

APCO notes, however, that it would not support a regulatory requirement that there be direct connection of Automatic Crash Notification (ACN) information to PSAPs. Rather, the public safety community and the telematics industry need to proceed collaboratively and voluntarily to develop appropriate standards and procedures for the gathering and dissemination of ACN and

other telematics information from telematics call centers to public safety communications centers.

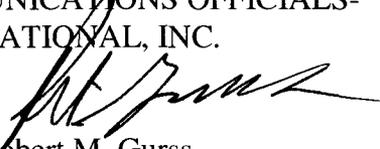
The Commission's policies should also distinguish between emergency calls that go through a telematics provider's call-center, and direct 9-1-1 calls made from a wireless telephone embedded within a telematics unit. The latter should be treated the same as any other wireless 9-1-1 call, and routed directly to the appropriate PSAP with associated ANI/ALI data required under Phase II of the Commission's E9-1-1 rules.<sup>1</sup>

APCO embraces the new technologies brought forth by the telematics industry for the benefit of public safety, and recognizes that a close working relationship between the telematics industry and the public safety community is necessary for the development and implementation of the standards and support of the new technologies.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY  
COMMUNICATIONS OFFICIALS-  
INTERNATIONAL, INC.

By:



Robert M. Gurss  
SHOOK, HARDY & BACON, LLP  
600 14<sup>TH</sup> Street, NW Suite 800  
Washington, DC 20005  
(202) 662-4856

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<sup>1</sup> See Comments of APCO, NENA, and NASNA in Response to Petition of OnStar Corporation for Declaratory Ruling (January 24, 2003).