

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

In the Matter of)
)
New Part 4 of the Commission's Rules) ET Docket 04-35
Concerning Disruptions to Communications)

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. ("APCO"), hereby submits the following brief reply comments in response to the Commission's *Notice of Proposed Rulemaking* ("NPRM"), FCC 04-30, in the above-captioned proceeding.

APCO is the nation's oldest and largest public safety communications organization.¹ Founded in 1935, APCO has over 16,000 members, most of whom are state or local government personnel who manage and operate communications systems for police, fire, EMS and other public safety agencies. APCO has long been an active participant in FCC proceedings concerning public safety communications, addressing both radio spectrum issues and Enhanced 9-1-1 (E9-1-1) matters that impact the operational requirements of Public Safety Answering Points ("PSAP") and the ability of emergency personnel to respond quickly and accurately to 9-1-1 calls.

Several wireless carriers filed initial comments in response to the *NPRM* opposing application of network disruption reporting requirements to wireless services. APCO urges that such requirements are necessary, at least as to 9-1-1 services. Fifty percent or more of the 9-1-1 calls received at many PSAPs are from wireless telephones. Thus,

¹ www.apcointl.org

PSAPs and others involved in the provision of 9-1-1 services need the ability to review information regarding network outages (both wireline and wireless) that impact their operations. Such information is used to evaluate network services, equipment, and internal operating standards. As discussed in the *NPRM*, network outage information has also been invaluable in the formation of industry-wide “best practices.”

The Commission correctly describes the critical role of our wireline *and* wireless communications networks to facilitate 9-1-1 and other emergency communications. Thus, when disruptions to those networks occur, complete and accurate information must be collected so that the Commission, the Network Reliability and Interoperability Council, equipment and service providers, PSAPs, and the telecommunications industry-at-large can take appropriate steps to prevent future disruptions and enhance public safety and homeland security.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY
COMMUNICATIONS OFFICIALS-
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