

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

In the Matter of)
)
E9-1-1 Requirements for) WC Docket 05-196
IP-Enabled Service Providers)
)

To: The Commission

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following comments in response to the Commission’s *Notice of Proposed Rulemaking (“NPRM”)* in the above-captioned proceeding regarding E9-1-1 requirements for Voice over Internet Protocol (“VoIP”) and other Internet Protocol-Enabled (“IP-enabled”) services, FCC 05-116, released June 3, 2005.¹

APCO is the nation’s oldest and largest public safety communications organization.² 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

¹ The *NPRM* was released in conjunction with a *First Report and Order* in WC Docket 04-34, in which the Commission adopted initial E9-1-1 requirements for VoIP providers.

² www.apcointl.org

operational requirements of Public Safety Answering Points (“PSAP”) and the ability of emergency personnel to respond quickly and accurately to 9-1-1 calls.

APCO strongly supports the Commission’s initial establishment of E9-1-1 requirements for VoIP services that interconnect with the public switched telephone network (“PSTN”). The Commission should be applauded for moving quickly and aggressively to protect the public’s safety by ensuring that VoIP customers who call “9-1-1” will be connected with an appropriate PSAP emergency call-taker and that location information will be provided with the call.

Much of the discussion in latest *NPRM* seeks information regarding methodology for truly *automatic* location information to be conveyed to the PSAP, without any manual intervention by customers.³ APCO has no independent expertise on those technical questions, but will reply to the comments of others as appropriate. However, APCO does support the suggestion in the *NPRM* that all terminal adapters or other equipment used in the provision of interconnected VoIP sold as of June 1, 2006, possess the ability to provide location information in the most accurate and cost effective manner possible.

The Commission’s initial decision is limited to providers of interconnected VoIP services. In the *NPRM*, the Commission inquires as to whether the rules should be extended to certain calls “terminated” to the PSTN through indirect means. We believe that any 9-1-1 call that is placed directly or indirectly through the PSTN must be subject to the E9-1-1 rules. Thus we support the Commission’s tentative conclusion that “a provider of a VoIP service offering that permits users generally to receive calls that originate on the PSTN and separately makes available a different offering that permits

³ The rules adopted in the *First Report and Order* allow for mechanisms by which subscribers manually register their physical location.

users generally to terminate calls to the PSTN should be subject to the rules we adopt in today's Order if a user can combine those separate offerings or can use them simultaneously or in an immediate succession."⁴

We also agree that regular progress reports are necessary, but take no position at this time regarding the necessary frequency of such reports. APCO also believes that there is a need for persons with disabilities to have interconnected VoIP service and other VoIP services to directly contact a PSAP via TTY or by other immediately available means.

CONCLUSION

For the reasons set forth above, APCO urges the Commission to adopt appropriate regulatory requirements to ensure that all interconnected VoIP calls provide full E9-1-1 capability.

Respectfully submitted,



Robert M. Gurss
Director, Legal & Government Affairs
APCO International
1725 DeSales Street, N.W.
Suite 808
Washington, DC 20036
(202) 833-3800

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⁴ *NPRM* at ¶58.