

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of:)	
)	
Public Safety and Homeland Security Bureau)	PS Docket No. 10-255
Seeks Comment on the Legal and Statutory)	PS Docket No. 11-153
Framework for Next Generation 9-1-1 Services)	PS Docket No. 12-333
Pursuant to the Next Generation 9-1-1)	
Advancement Act of 2012)	

REPLY COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following brief reply to a comment filed in response to the Public Safety and Homeland Security Bureau’s *Public Notice*, DA 12-1831 (rel. Nov. 13, 2012), in the above-captioned proceeding.

APCO has already addressed most of the issues raised in other comments.¹ However, a brief reply is required regarding the comments submitted by AT&T, Inc. (“AT&T”) recommending that Congress conduct hearings to examine the current 9-1-1 structure that relies upon 6,800 Public Safety Answering Points (PSAPs), and the current funding model for the delivery of 9-1-1 services. APCO does not dispute the latter point, as we have long argued that the current fee structure is inadequate, especially with the growing diversification of communications services and providers. However, AT&T’s suggestion that Congress review the basic PSAP structure does not take into consideration the fundamentally local nature of first responder agencies or the substantial benefits of local PSAPs. For example, local PSAPs facilitate the ability of call-takers to be familiar with local landmarks and “non-standard” verbal

¹ APCO filed initial comments on Dec. 13, 2012.

descriptions of roadways, buildings and other locations from which callers may be reporting emergencies. In addition, PSAPs often maintain local information critical to first responders, such as which building containing hazardous materials and homes that have residents who may have special needs or disabilities. Local PSAPs also work closely with their local law enforcement agencies, fire departments, emergency medical services, and alarm service providers, especially when call-taking and dispatch are handled in common facilities.

APCO has been a leader in providing best-practices and other guidance regarding coordination among and voluntary consolidation of small PSAPs to reduce costs and improve efficiency. We also recognize that the deployment of NG9-1-1 will probably lead to greater PSAP consolidation in some areas, and afford technological advancements concerning local response information. However, the basic structure of 9-1-1 will continue to be based on *local* needs and requirements. States and localities must retain their respective jurisdiction and control over choices in distribution and numbers of PSAPs.

Therefore, for the reasons set forth above, APCO does not believe that Congressional review of the current PSAP structure would be productive or beneficial at this time. APCO would instead welcome more immediate focus on the pressing issue of creating funding mechanisms to ensure continued sustainability and progress in 9-1-1 and NG9-1-1 services.

Respectfully submitted,

/s/

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