



Leaders in Public Safety Communications™

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February 19, 2013

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

RE: PS Dockets 11-153, 10-255, and 12-333, ex parte notification

Dear Ms. Dortch:

This is to inform the Commission that on February 19, 2013, Mr. Terry Hall, President of APCO International, met with the Public Safety & Homeland Security Bureau (PSHSB) to discuss issues related to NG9-1-1. The meeting was attended by David Turetsky, David Furth, Tim May and Erika Olsen (via telephone). The undersigned also participated via telephone.

Attached is a summary of the points addressed by Mr. Hall during the meeting. Please contact the undersigned should the Commission have any questions.

Respectfully submitted,

/s/

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cc: David Turetsky  
David Furth  
Tim May  
Erika Olsen

APCO/PSHSB Meeting  
February 19, 2013

**NG9-1-1 standards to ensure interoperability and interconnectivity**

- FCC should continue to promote adoption of minimum standards for NG911 services, including NG911 interoperability across state lines.
- Standards should include common language for text-to-9-1-1 “bounceback” messages, with no variation in message due to the reason the text cannot be delivered.
- FCC should set national policy for 911 and transition to NG911

**Provide 9-1-1 authorities with additional flexibility during the NG9-1-1 transition**

- FCC should eliminate rules requiring non-service-initialized (NSI) phones to be capable of completing a call to 9-1-1. Current problems with calls from NSI phones will become worse in the NG9-1-1/IP-based environment.
- States should be encouraged to modify state laws to add “false 9-1-1 texts” to existing laws regarding false voice calls to 9-1-1.
- FCC should modify/eliminate TTY requirements as they become unnecessary with NG9-1-1 deployment.
- FCC should consider alternative of deploying a national NG9-1-1 architecture that would allow PSAPs to connect to a nationwide ESInet, prior to the deployment of statewide/regional ESInets.
- FCC should ensure 9-1-1 meets consumers’ expectations, establish responsibilities of service providers delivering 9-1-1 traffic, and ensure core functionality for NG9-1-1 networks.
- FCC should clarify whether location and routing requirements for IP-based services imposed by states conflict with federal jurisdiction.
- FCC and Congress should consider federal provisions that would pre-empt state laws that prevent 9-1-1 authorities from becoming system service providers.

**Location Information**

- FCC should promote the development of more precise 9-1-1 caller location information to support NG9-1-1.
- FCC should set location determination obligations of access network providers.
- Congress should empower the Commission with sufficient authority to adopt and enforce requirements concerning the transmission of NG9-1-1 caller information to PSAPs, including location information and means to contact the caller regardless of the technology used (voice, text, data, apps).
- Further, Congress should empower the FCC to require service providers, device manufacturers, application developers, etc. that provide NG9-1-1 capabilities to regularly provide the FCC with testing data concerning the accuracy of 9-1-1 caller information provided to PSAPs. This information should also be made available to PSAPs and the general public.

## **Funding**

- FCC should support CSRIC's Working Group 4B recommendation that a Blue Ribbon Panel be convened to address 911 funding issues.
  - o Today's various 9-1-1 funding mechanisms are already beset with a number of problems.
  - o An approach that is centered on service providers, even if nationalized, does not address the complexity in an NG9-1-1 world with services that are not easily tied to service providers and recurring billing practices. We already face this problem with pre-paid cellular phones.
  - o Even more difficult are devices and apps, such as "over-the-top" apps that provide communications capabilities outside of cellular networks such as with Wi-Fi networks. For example, how should funding be captured from an NG9-1-1 communication made from a non-cellular device used over a Wi-Fi network at a local coffee shop?
  - o Such communications methods do not fit neatly in a service provider model. Assessing a one-time fee at the point of sale of the device or app purchase is a possibility, but would not provide a sustainable revenue source. It would also be unwieldy, if even possible, to assess the Wi-Fi provider or the place of business.
  - o Further, a service-provider model assumes that it is the customer that benefits from the 9-1-1 call, which is not always the case.
  - o For these reasons, it might be best for Congress and the states to consider replacing the current service provider-focused funding model with a mechanism that is more general revenue-based.

## **State-Level Coordination**

- State-level coordination is necessary to best facilitate adherence to a national framework. This approach will:
  - o reduce procurement costs,
  - o provide a uniform NG9-1-1 experience for both the public and PSAPs regardless of location, device, or service used, and
  - o create reliable expectations and standards on the part of the vendor community
- APCO envisions a number of benefits if state-level oversight bodies coincide with the state-level governance mechanisms developed for purposes of consulting with FirstNet on the deployment of the nationwide public safety broadband network.
  - o NG9-1-1 planning and FirstNet planning should go hand-in-hand. For example, with both networks in place, a consumer will be able to send a photo of a building fire to the NG9-1-1 PSAP, which could add floor plans and dispatch the complete data to the responding agencies, putting this information in the hands of the fire chief prior to arrival on scene.