



Leaders in Public Safety Communications™

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June 17, 2013

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

RE: PS Docket Nos. 13-75 and 11-60, Notice of Ex Parte Communications.

Dear Ms. Dortch:

This is to inform the Commission that on June 13, 2013, representatives of APCO met via conference call with the following Commission staff to discuss the above-referenced proceedings concerning 9-1-1 reliability: Lauren Kravetz, John Healy, Michael Connelly, Eric Schmidt, Cecilia Mateo, Jerome Stanshine and William Richardson. Terry Hall, Gigi Smith, John Wright, Jay English and the undersigned participated on APCO's behalf.

APCO's representatives discussed the positions set forth in its previously submitted written comments. In particular, APCO explained that the definition of "9-1-1 service provider" for purposes of outage notification requirements should be sufficiently broad to include any facilities or services involved in the initiation, transport, or delivery of a 9-1-1 call. This would include both wireline and wireless services, providers of affiliated transport systems (CAMA, SS7, etc.), VoIP providers, and data centers associated with the delivery of both call and caller information. The definitions should account for the existence of virtual PSAP operations supported by one or more of these services/providers.

APCO also clarified its view that outages that must be reported to a PSAP should include any network outage that disrupts the ability of subscribers in a PSAP's service area to dial 9-1-1. PSAPs and first responder agencies need to know when the citizens they serve are unable to seek emergency assistance.

Finally, the APCO representatives re-emphasized the need for service providers to verify that outage notifications have in fact been received by relevant PSAPs.

Please contact the undersigned should the Commission have any questions.

Respectfully submitted,

/s/

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