

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

In the Matter of)
)
Application of Verizon New Jersey, Inc.) WC Docket No. 13-150
and Verizon New York, Inc. to Discontinue) Comp. Pol. File No. 1115
Domestic Telecommunications Services)

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following comments in response to the Commission’s *Public Notice*, DA 13-1475, released June 28, 2013, seeking comments regarding the above-captioned applications of Verizon New Jersey, Inc. and Verizon New York, Inc. (collectively “Verizon”) requesting authority under Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.71 of the Commission’s rules, 47 C.F.R. § 63.71, to discontinue domestic telecommunications services in certain parts of New Jersey and New York affected by Hurricane Sandy.

Founded in 1935, APCO is the nation’s oldest and largest public safety communications organization. Most APCO members are state or local government employees who manage and operate communications systems -- including Public Safety Answering Points (PSAPs), dispatch centers, radio networks, and information technology -- for law enforcement, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO has long been involved in Commission proceedings regarding 9-1-1 capability and other aspects of public safety communications.

Verizon is requesting authority to discontinue wireline service in certain isolated areas, such as a portion of Fire Island, where Hurricane Sandy destroyed or “rendered inoperable”

copper wireline services. Verizon proposes to replace wireline service in those areas with its Voice Link fixed wireless communications service whereby each subscriber's fixed telephone equipment is be connected to the public switched network via a wireless cellular link installed by Verizon. APCO's principal concern in this regard is to ensure that all subscribers in the affected area have 9-1-1 service comparable to the wireline service being replaced. While APCO takes no position on Verizon's specific request, we urge the Commission to take the following factors into consideration in this and any future requests to discontinue wireline service and replace it with wireless service.

Wireless communication generally does not have the same level of reliability as copper wireline services, which could limit access to 9-1-1 during outages. Wireless services are susceptible to disruptions from extreme weather and resulting damage to transmission facilities. A single cell site or cell sector outage, particularly in rural or isolated areas, could also leave large numbers of customers stranded, while a typical wireline outage generally has a more isolated impact. Wireless networks typically do not have the network diversity that is present with copper and fiber facilities that may be either overhead, buried or more frequently a combination of both. Wireless also faces quality of service limitations on capacity and network access (which is generally not an issue with copper wire communications), which could be a particular problem in seasonal resort areas such as Fire Island that experience periods of substantial peaks in service demand.

Therefore, if the Commission grants Verizon's request, it should require that Verizon take appropriate steps to increase the reliability of the wireless networks used for Voice Link communications in the impacted areas. For example, relevant cell sites should be hardened and equipped with substantial back-up power, 9-1-1 calls should be given priority similar to wireline

networks, and additional cell sites should be added to increase capacity and ensure that the area has signal coverage from more than one site.

APCO acknowledges and appreciates Verizon's statement that Voice Link will provide the same street-level location information to PSAPs as a wireline network. There is a concern, however, that subscribers could remove and relocate their Voice Link modems, despite instructions to the contrary. That could create problems similar to nomadic VoIP devices which, despite fixed address registration, can be moved without providing automatic location information to ensure that 9-1-1 calls from such devices are routed to a correct PSAP. Therefore, while APCO acknowledges the challenges, steps should be taken to prevent Voice Link customers from moving equipment to other locations.

Finally, there is a concern that Voice Link may not accommodate certain alarm services that provide a critical link to PSAPs and facilitate the rapid dispatch of emergency personnel.

CONCLUSION

Therefore, APCO urges the Commission to consider the 9-1-1 issues noted above in its consideration of the Verizon request.

Respectfully submitted,

/s/

Robert M. Gurss
Senior Regulatory Counsel
APCO International
(202) 236-1743 (m)
gurssr@apcomail.org

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