

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

In the Matter of)	
)	
Improving the Resiliency of Mobile Wireless Communications Networks)	PS Docket No. 13-239
)	
Reliability and Continuity of Communications Networks, Including Broadband Technologies)	PS Docket No. 11-60
)	

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*, FCC 13-125, released September 27, 2013 (“*NPRM*”), in the above-captioned proceedings.

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.

The resiliency of commercial mobile wireless communications networks during and immediately following major emergencies is of great concern to public safety agencies across the nation. The vast majority of calls to 9-1-1 are now from wireless devices, so any wireless network outage has the potential to block life-saving calls for emergency assistance. Further, the general public uses wireless devices to receive emergency alerts, as well as a growing number of

mobile applications providing helpful information and resources during emergencies.¹ Commercial wireless networks, especially broadband networks, are also used by many government officials and some first responders to supplement dedicated public safety communications networks, especially during and following major disasters. Therefore, wireless network outages have a significant impact on the ability of public safety agencies to receive information regarding, and respond to, emergencies.

The Commission seeks comments in the *NPRM* on proposals to improve the resiliency of mobile wireless networks by requiring commercial mobile radio service (CMRS) providers to submit information for public disclosure regarding cell site operational status during and immediately after major disasters. The Commission suggests that this “could in turn encourage competition to improve the resiliency of mobile wireless communications networks during emergencies.” APCO will defer to other experts regarding the specifics of the Commission’s incentive-based proposals, though we note our long-standing support for the concept of transparency, and for any viable approach that is likely to improve wireless network resiliency and reliability. Aside from any potential competitive incentives, the correct type and manner of wireless carrier disclosures could be especially useful for PSAPs and other public safety personnel. However, data that would be useful to public safety may be different, and certainly more detailed, than the information in the consumer-oriented disclosures proposed in the *NPRM*.

From a public safety perspective, reporting of specific types of data would be useful concurrent with a disaster or catastrophic event. PSAPs need to be made aware of site and system outages as soon as they occur, ideally through uniform reporting mechanisms.

¹ APCO hosts a website listing mobile apps used for public safety and emergency response, which can be found at www.AppComm.org.

Disclosing a “running total” of operational sites would be less valuable than a notification portal or system that provides immediate notification of specific outages. Public safety needs to know where and when a site is not operational, the nature of the outage (physical tower down, power out, antenna out of service, *etc.*) and expected repair time.

Site outages typically fall under one of three categories:

(1) Power outage: An entire site, sector, or region could be affected. Thus, it is important to know whether this is a localized power issue and, if so, whether it is confined to just a single site, and whether it is generator related or grid related. Such information is important in that it both narrows the scope of the outage and suggests possible recovery times.

(2) Physical damage: Outages caused by physical tower damage as a result of severe weather or fires can also disrupt radio equipment, antennas and any number of support elements. As with power outages, reporting should include the type of outage, specific location of the towers out of service, and expected recovery time to be of benefit to public safety.

(3) Transport network failure: Such a failure (wireline or wireless) will likely affect a large number of sites, though a “single point of failure” on the network may be subject to relatively rapid repair or mitigation. Again, the more specific the data provided, the better public safety agencies can implement contingencies.

The Commission also seeks comment on what metric would provide the best picture of a network’s operational status. Aside from the detailed site-specific information noted above, a coverage-based metric or a graphic would be more useful than raw percentages. Data that could be made available in the form of a graph that can be overlaid onto a GIS-based CAD or mapping system would also be useful for PSAPs.

Finally, the *NPRM* asks whether mobile wireless service providers should be required to report and disclose information about the practices they have implemented to promote the reliability of their networks. This could have significant value, though it should be coupled with some level of minimum standards or best practices. More specifically, APCO supports the concept of requiring wireless service providers to report detailed information about their provisioning of back-up power as well as available supplementary deployments.

CONCLUSION

As set forth above, APCO supports Commission policies and carrier initiatives that will lead to more resilient and reliable wireless networks and to the disclosure of detailed outage information that would be useful to public safety personnel.

Respectfully submitted,

/s/

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