

**International Association of Chiefs of Police
International Association of Fire Chiefs
National Association of State Emergency Medical Services Officials
National Sheriffs' Association**

February 22, 2017

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

Re: PS Docket No. 07-114, Wireless Location Accuracy Requirements

Dear Ms. Dortch:

The International Association of Chiefs of Police (IACP), the International Association of Fire Chiefs (IAFC), the National Association of State EMS Officials (NASEMSO), and the National Sheriffs' Association (NSA) together file this letter in response to the Federal Communications Commission's (FCC) Fourth Report and Order (April 3, 2015) and the "Roadmap for Improving E911 Location Accuracy" (November 18, 2014), filed in the E911 Location Accuracy proceeding (PS Docket No. 07-114) by the Association of Public-Safety Communications Officials (APCO), the National Emergency Number Association (NENA), and wireless carriers AT&T Mobility, Sprint, T-Mobile USA, and Verizon.

The IACP is the world's largest association of law enforcement leaders, representing more than 27,000 members. The IAFC represents approximately 12,000 leaders of the nation's fire and emergency service. The NASEMSO represents executive, medical, operational, regulatory, and other directors of statewide EMS systems in all 56 states and territories. The NSA represents the 3,080 sheriffs of the United States and advocates for policies that will improve the quality of service to their constituents.

Our organizations commend the FCC for its focus on improving the location information being provided to first responders from wireless devices during 911 calls. More accurate location information allows our members to provide lifesaving assistance in the most time-effective manner. The IAFC, the IACP, and NASEMSO are members of the CTIA 911 Location Accuracy Advisory Group (Advisory Group). The NSA, while not a member of the Advisory Group, endorses our position in this filing. We would like to bring two issues of concern to the FCC's attention:

1). Concern about the Interpretation of the Definition of "Dispatchable Location"

In November 2014, the four-national wireless carriers, APCO and NENA entered a "Roadmap for Improving E911 Location Accuracy (Roadmap)." The FCC adopted the Fourth Report and Order on January 29, 2015, and released it, with an effective date of April 3, 2015.

Leading up to the FCC Fourth Report and Order, numerous comments were submitted. On December 15, 2014, CTIA, on behalf of the wireless carriers, submitted comments discussing the Roadmap. In part II of the filing, CTIA stated that the Roadmap establishes a near-term path to deliver dispatchable

location (DL) information. The Roadmap cites DL as the “gold standard” for wireless location information. In the discussion, CTIA states that “like an address sent with traditional wireline 911 calls today, DL provides an address for wireless 911 calls plus more specific information to send first responders the right door to kick in.”¹ We agree.

T-Mobile filed comments on January 22, 2015,² which included an analysis on using Wi-Fi, Bluetooth and various small-cells to be able to locate a caller. A footnote under item 6.0 (page 32) of the report describes DL in the following manner: “When comparing technologies, the key goal of providing public safety with a ‘dispatchable address’ must be considered. As with the beacon-based technologies analyzed in this paper, dispatchable location must include not only a civic street address, but also the floor information and office suite, apartment, hotel room or classroom where applicable,” Again, the undersigned organizations agree.

The IAFC, IACP, NASEMSO, the National Sheriffs Association, and the National Volunteer Fire Council filed comments prior to the Fourth Report and Order being issued supporting the concept of DL.³ The FCC Fourth Report and Order cites the Roadmap as using the term DL rather than a dispatchable address to describe the objective of the FCC’s *Third Further Notice* which proposed indoor accuracy requirements based on x/y/z coordinates. The FCC noted that public safety would be better served if public safety answering points (PSAPs) could receive the caller’s building address, floor level, and suite/room number. The undersigned agree with this and believe the 4th Report and Order allowed the Roadmap signatories to use DL since the wireless carriers specified that in-building technology such as small cells and Wi-Fi and Bluetooth beacons, would make DL solutions technically feasible in a much shorter timeframe than anticipated. The FCC Fourth Report and Order defines DL as being “the verified or corroborated street address of the calling party plus additional information such as floor, suite, apartment, or similar information that may be needed to adequately identify the location of the calling party.”⁴ We agree.

CTIA is leading an effort to develop the National Emergency Address Database (NEAD) that is intended to securely and privately store the already available millions of Wi-Fi Access Points and Bluetooth beacons to help provide a DL to PSAPs. The NEAD LLC was formed as an independent entity to administer and operate the NEAD consistent with the FCC’s rules. The NEAD LLC then selected the Alliance for Telecommunications Industry Solutions (ATIS) as the program manager for the NEAD. Through the NEAD and associated technology standards, the goal is that wireless carriers will be able to deliver a DL to a PSAP that will provide first responders with information to more quickly, effectively and safely respond to emergencies. As the frontline first responders which respond to 911 calls, we have concerns with ATIS standard, ATIS-0700028 v1.1, “Location Accuracy Improvements for Emergency Calls.”

At the Advisory Group’s quarterly meeting held September 30, 2016, the ATIS standards development process was discussed. The ATIS standard planned on having two levels of DL. DL Level 1 is information provided to the PSAP which will provide location information if the location is nearby and/or is either one floor above or below from where the individual is in a multi-level structure. Also,

¹ December 15, 2014, filing of comments of CTIA in docket 07-114, Wireless Location Accuracy Requirements, Roadmap for improving E911 Location Accuracy.

² Filing of January 22, 2015, filed by Harris, Wiltshire & Grannis on behalf of T-Mobile in *Wireless E9-1-1 Location Accuracy Requirements*, PS Docket No. 07-114.

³ Comments submitted to the FCC December, 15, 2014.

⁴ FCC Fourth Report and Order, February 2, 2015, effective April 3, 2015, paragraph 44.

it appears from the ATIS standard that an adjacent building or one across the street could qualify as DL Level 1. The ATIS standard describes a use case where the building from where the individual calling has no Wi-Fi access points. If an adjacent building has registered Wi-Fi points, the NEAD sends the emergency responders to that building and describes this as the DL. We strenuously disagree with this situation being deemed DL.

The standard also describes a DL Level 2, which is closer to the definition in the Fourth Report and Order. DL Level 2 is the information provided which finds the individual on the same floor and the suite (in other words, “the right door to kick in.”) DL Level 2 follows the definition of DL in the Roadmap and the FCC’s Fourth Report and Order. The ATIS standards were developed without the input or agreement of the Advisory Group. We raised our concerns with the standard at the September meeting and in subsequent discussions with CTIA, the wireless carriers, and APCO/NENA.

The use of DL Level 1 creates confusion with the FCC definition of DL. We believe that DL is information which tells the emergency responders where the caller is in a building. To use the term DL to describe a situation where an access point is located, and not necessarily where the person is located, waters down what the wireless carriers and APCO/NENA agreed to in the Roadmap and the Fourth Rule and Order. We cannot agree or support the description of level 1 information as DL. Fire chiefs, police chiefs and EMS officials will not accept a DL Level 1 as being the “gold standard.” We suggested that level 1 information be called “vicinity location” or a similar term to describe a location other than where the caller is located. Our suggestions have fallen on deaf ears.

In our view, the wireless carriers and APCO/NENA persuaded the FCC to relax a much tighter 911 framework outlined in the *Third Further Notice* by promising the “gold standard” and it now appears the Roadmap signatories are walking back from that promise. The undersigned find this unacceptable.

2) Transparency of Test Results

A transparent process is clearly intended in the Fourth Report and Order, and in the Roadmap. The wireless carriers cite the FCC Fourth Report and Order (paragraphs 131 & 132) as justification that during Stage 1 testing they are not required to make public the details of test results for technologies that have been certified by the Test Bed LLC, but such results may be provided to non-nationwide wireless providers that cannot participate directly in Stage 1 testing.

*The actual wording of the Fourth Report and Order for paragraph 131 – Confidentiality of Test Results reads, “In order to protect vendors' proprietary information, **only summary data** was made available to all other parties. At this time, we will not require CMRS providers to make public the **details of test results** for technologies that have been certified by the independent test bed administrator.”*

The Fourth Report and Order itself doesn’t prohibit disclosing “summary” results of any, including “existing” technologies; it merely states it won’t require the “details” to be disclosed to protect vendor’s proprietary information. As the FCC noted, summary test data was publicly disclosed during the Communications Security, Reliability, and Interoperability Council (CSRIC) III test program in 2012, which our organizations found informative and very useful. We are heartened by the FCC’s recent public notice on the wireless carriers’ reporting obligations whereby the FCC reserved the right to disclose summary data of this nature. We believe our organizations have an ongoing public interest, both for our membership and for the public at large, to understand as fully as possible the performance

of these life-saving technologies. To do so effectively requires visibility into both the test results from existing and emerging technologies (at a summary level) as well as the live E911 call reporting results from the various carriers. To expect less or accept less would be a disservice to our memberships, our missions, and the public at large.

Thank you for attention to these important issues.

Respectfully,

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