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May 12, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

RE: PS Docket No. 07-114, Wireless E911 Location Accuracy Requirements

Dear Secretary Dortch,

On behalf of the nearly 10,000 fire and emergency services chiefs of the International Association of Fire Chiefs (IAFC), I write to express the IAFC's view that the deployment of advanced location technologies is critical to the future of emergency calling systems, public safety response capabilities, and longer term to the personal safety of all first responders. As the Federal Communications Commission (FCC) acknowledged in its recent Third Further Notice of Proposed Rulemaking (Third Further Notice), changes in technology and mobile device usage by the public mean that "it is increasingly important for Public Safety Answering Points (PSAPs) to have the ability to accurately identify the location of wireless 911 callers regardless of whether the caller is located indoors or outdoors."¹

The IAFC agrees with the FCC's stance that emergency callers are "increasingly replacing traditional landline telephony with wireless phones."² Today, up to 80% of 911 callers use a mobile phone to report emergencies. Further, since there is an increasing number of homeowners and tenants who have wireless-only telephone service, even 911 calls placed from a residence are likely to be from wireless phones. As the rate of wireless 911 calls placed from wireless phones has increased, the percentage of 911 calls placed from indoor locations has also increased. Indeed, the FCC has accurately noted that the "majority of wireless calls now originate indoors."³ Recently, a resolution was submitted to the IAFC Board of Directors to call upon the FCC to require maintaining the current American universal-service landline telephone network until Caller ID-related, power-supply, universal access and maintenance of service, and unlimited cross-system telephone traffic issues are resolved with wireless calls providing accurate location technology when an individual dials 9-1-1 for help from a wireless phone.

As the IAFC has explained in prior filings in dockets related to this issue, the deployment of advanced location technologies is critical to the future of emergency calling systems and public safety response

¹ *Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, Third Further Notice of Proposed Rulemaking, FCC 14-13 (Feb. 21, 2014).*

² *Wireless E911 Location Accuracy Requirements, 79 Fed. Reg. 17820, ¶ 1 (proposed March 28, 2014).*

³ 79 Fed. Reg. at 17822, ¶ 19.

capabilities.⁴ Following the FCC's recent publishing of its Third Further Notice, the IAFC met with NextNav and True Position, two of the companies having indoor location technologies. While the FCC vote was 5-0, two of the commissioners expressed the view that it appeared that the deployment milestones were too aggressive. To gain a better understanding of this concern, the IAFC also met with T-Mobile to obtain the carriers' views.

From our discussion with T-Mobile, we understand their position, in part, is that regulatory action can only be taken with respect to what is technically and economically feasible. Thus, the most immediate step the Commission can take is to determine what is actually feasible, technically, operationally and economically. In doing so, the Commission must ensure that all stakeholders—including the Commission, public safety answering points (PSAPs), and providers—have a common set of data from which to make decisions. A key part of that is establishing a permanent working common test bed for location technologies, particularly with respect to indoor environments. T-Mobile states that the most important thing the Commission can do at this point is to continue the further development of a common indoor accuracy location test bed, and to use such a test bed to evaluate candidate technologies further. They argue that the FCC should continue to pursue a data-driven examination of indoor E911 issues using the Commission's Security, Reliability, and Interoperability Council (CSRIC) in another CSRIC test instead of moving forward with unachievable milestones.

As a result of our meetings, the IAFC has given a lot of thought to the feasibility of meeting the milestones and providing improved indoor location technology. Given the magnitude of this public safety threat, plus what appears to us to be improved indoor location accuracy available today, the IAFC concurs with the Commission that "the time has come" for specific, near-term indoor location accuracy requirements.⁵ The IAFC at this time sees little reason to delay much-needed requirements for further testing. We believe the Commission would have called for further testing if it deemed this to be required before proceeding further in development of indoor location technology. Instead, the FCC should promptly adopt clear near-term requirements with a reasonable timeline for compliance. Not only will this approach ensure that the wireless industry maintains its focus on this important issue, it will also drive the implementation and improvements necessary to meet the FCC's long-term objective of ensuring a reliable "dispatchable address" for every 911 call.

The IAFC supports the Commission's effort to ensure that PSAPs receive accurate information to identify the indoor location of wireless 911 callers quickly and effectively. Specifically, IAFC supports (1) adoption of effective location technologies for indoor and outdoor 911 calls; and (2) adoption of location technologies that can generate a location quickly enough and with sufficient accuracy to support horizontal and vertical location.

The IAFC applauds the FCC for developing rules that appear to be feasible with current technology and require sufficiently precise location information to be useful to first responders. As the Commission has acknowledged, indoor locations require higher accuracy "because indoor incidents may not be visible to first responders." The proposed 50 meter horizontal accuracy and 3 meter vertical accuracy requirements appear from our understanding of the current technology an appropriate near-term step to ensure that public safety has the best information available to carry out emergency response. Also, since medical care can be given at the scene or en-route to a hospital, a reduction of the time for first responders to locate the scene will result in more prompt delivery of patient care, even if the overall time-span in transporting the patient to the hospital is not reduced. By reducing response times, people affected by cardiac arrest, smoke inhalation, or severe trauma will receive care faster and have an increased chance of survival.

⁴ See, e.g., Letter from Chief Hank Clemmensen, President and Chairman of the Board, IAFC, to Marlene H. Dortch, Secretary, FCC, Docket No. 11-49 (Mar. 13, 2013); Letter from Chief William R. Metcalf, President and Chairman of the Board, IAFC, to Marlene H. Dortch, Secretary, FCC, Docket No. 07-114 (September 15, 2013);

⁵ *FNPRM*, ¶ 2

The IAFC considers the deployment of indoor location accuracy technology a noteworthy preliminary step toward a future that will have fire service first responders equipped with and wearing technology that will greatly improve their personal safety if and when they need assistance. Firefighters often have precious little time to locate and assist fellow firefighters who may be trapped in a burning building. In such an environment, there often is not enough time to search a floor and then determine that the firefighters in need are actually one floor above or below the one first searched. The ability of incident command to know the location of their firefighters in a burning building would be a major step forward with indoor location technology. The policy the FCC creates to protect the public will ultimately benefit all first responders as the technology becomes more developed and mature.

The IAFC appreciates the work that the FCC has done to date to address this issue that is vital to the effective response of fire, emergency medical services and other emergency responders. We look forward to the adoption of the proposed rules as soon as possible, and will continue to work with the FCC as these rules are implemented. Please contact Jim Goldstein, the IAFC's Government Relations and Policy Manager, at 202-494-6607 or jgoldstein@iafc.org, if we can be of assistance on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Metcalf". The signature is stylized and cursive, with a large, sweeping initial "W".

Chief William R. Metcalf, EFO, CFO, FIFireE
President and Chairman of the Board

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