

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Public Safety and Homeland Security Bureau Seeks Comment on Vertical (Z-Axis) Accuracy Metric Proposed by the Nationwide Wireless Carriers)	PS Docket No. 07-114
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**Comments of the
National Association of State 911 Administrators**

The National Association of State 911 Administrators (NASNA)¹ is pleased to offer reply comments on the 10 September 2018 Public Notice on the vertical (Z-Axis) accuracy metric proposed by the nationwide wireless carriers.²

CTIA's cover letter proposed a Z-Axis accuracy metric of +/- 5 meters for 80% of location fixes for the 2021 and 2023 deadlines in the top 25 and top 50 Cellular Market Areas (CMAs). NASNA agrees with the National Emergency Number Association ("NENA") and the Association of Public-Safety Communications Officials-International, Inc. ("APCO") that a metric of +/- 5 meters is not accurate enough for 911 and first responders.³ We urge the Commission to reject the proposal.

The data provided in the Report show that it is possible using existing technologies to achieve accuracy of less than 2 meters for 80% of location fixes in at least some of the test environments and morphologies.⁴ Since this level of accuracy appears to be achievable, NASNA urges the Commission not to settle for any Z-Axis metric greater than +/- 2 meters. Floor-level accuracy is what public safety requires. We agree with APCO that if there isn't an approved Z-Axis metric, then the Public Safety and

¹ NASNA represents state 911 programs in the field of emergency communications. NASNA provides state 911 leaders' unique expertise to national trade associations, public policymakers, the private sector, and emergency communications professionals at all levels of government as they address complex issues surrounding the evolution of emergency communications.

² Individual members may provide separate comments to the Commission that agree with, amplify, differ from, or are in addition to the comments offered by NASNA on this matter.

³NENA Comments pages 2-4; APCO Comments pages 2-5.

⁴ Stage Z Report, Section 11.2, page 120

Homeland Security Bureau should recommend that the Commission reject CTIA and the nationwide carriers' proposal and require the carriers to provide dispatchable location.⁵

NASNA does not recommend that the Commission propose Z-Axis rules at this time. By CTIA's and the nationwide carriers' admission, there remain many unanswered questions: "While the results of the testing provide helpful data and lessons learned, numerous key questions remain that could not be answered through the Stage Z testing."⁶ The bulleted list following that statement contains 12 critical questions. All of them are important to answer in the record before initiating a rulemaking that would precede deployment in a live 911 environment.

NASNA recommends that the Commission order further testing to address these issues. It would certainly be beneficial to involve more vendors than just NextNav and Polaris Wireless, and the Report stated that other vendors have indicated that their Z-Axis solutions would likely be ready for evaluation in the Test Bed within the next twelve months.⁷ Furthermore, it would be prudent to conduct more thorough testing in all environments and morphologies.

The Commission's rules clearly define dispatchable location as including floor level.⁸ Public safety has consistently stated that it needs to know the floor from which an emergency call originated. The proposed Z-Axis metric is not adequate to identify floor level with the degree of accuracy that is required. Dispatchable location would be adequate. While we wait for more and better Z-Axis data and a potential future rulemaking, we urge the Commission not to delay in requiring carriers to deliver dispatchable location to 911.

We appreciate the Commission's attention to this important issue and thank you for the opportunity to offer comments for your consideration.

⁵ APCO comments page 2

⁶ Stage Z Report, Section 11.3, pages 121-122

⁷ Stage Z Report, Section 11.3, page 122

⁸ 47 C.F.R. 20.18

11 October 2018

Respectfully submitted,

A handwritten signature in cursive script that reads "Evelyn Bailey".

Evelyn Bailey
Executive Director
National Association of State 911 Administrators
380 Blake Hill Road
East Calais, Vermont 05650-8180
(844) 381-3635