

United States Senate

WASHINGTON, DC 20510

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November 15, 2018

The Honorable Ajit V. Pai
Chairman
455 12th Street, Southwest
Washington, DC, 20544

Dear Chairman Pai:

We write regarding the Federal Communication Commission's (FCC) existing rules governing location identification of 911 callers and the Commission's recent work to put in place new requirements that will bolster emergency personnel's ability to locate people in need. The FCC has proposed important new rules to ensure that Public Safety Answering Points (PSAPs) are able to receive callers' location information with enhanced precision, regardless of the type of device or service used to place 911 calls. As technology advances, it is imperative that the Commission continues to update guidelines governing the nation's emergency response system to meet Americans' health and safety needs. We commend the Commission for its work to implement critical updates to the 911 system, urge you to consider additional rules that would further improve the precision of location information sent to PSAPs, and request information regarding wireless carriers' compliance with existing standards.

All Americans should be able to dial 911 with the expectation that emergency personnel are capable of locating them quickly and accurately. Regardless of the technology or service that an individual uses to seek emergency assistance, PSAPs should receive the critically important location information that will allow them to effectively respond to the request. We are pleased, therefore, that in accordance with RAY BAUM'S Act, the Commission is proceeding to establish rules so that PSAPs can access addresses and other pieces of relevant location information when requests for emergency assistance are made through alternative technologies, such as multi-line telephone systems, interconnected Voice over Internet Protocol (VoIP) providers, text messages, and Internet-based Telecommunications Relay Services (TRS).¹ This proposal is an important step to bring the emergency response system into the 21st Century, as the manner in which Americans seek health and safety assistance continues to evolve.

The Commission should also consider implementing additional rules and updates to improve emergency response procedures, such as more precise location accuracy standards for wireless carriers. In 2002, the FCC implemented Phase II of the Commission's Enhanced 911 rules and required wireless carriers to provide PSAPs with the latitude and longitude within 50 to 300 meters of a 911 caller. In 2015, the FCC updated these rules and raised its accuracy standards.

¹ *Implementing Kari's Law and Section 506 of RAY BAUM'S Act; Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, PS Docket No. 18-261, Notice of Proposed Rulemaking, FCC (September 26, 2018) (NPRM).

Specifically, it required wireless carriers to provide dispatchable location information within 50 meters of a caller for 80% of 911 calls by 2020. Delays in emergency response due to inaccurate or imprecise location information can cause tragedy.² Therefore, we request a status update and data illuminating whether wireless carriers are on track to meet this benchmark. Consistent with the Public Safety and Homeland Security Bureau's recent request for comment on new requirements for wireless carriers to provide 911 callers' precise vertical (z-axis) location information,³ we encourage you to explore the technical feasibility of requiring mobile carriers to provide even more precise caller location information to PSAPs, while ensuring the privacy of wireless callers and the security of their information.

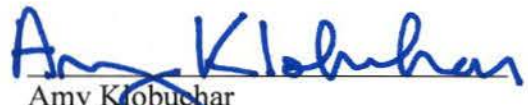
The accuracy of transmitted location information for a person in need can mean the difference between life and death. As the Commission continues to update 911 system rules, we urge you to consider all appropriate options for improving PSAPs' location identification capabilities.

Thank you for your attention to this important matter. We request a response to this letter by December 6, 2018.

Sincerely,



Edward J. Markey
United States Senator



Amy Klobuchar
United States Senator

CC: The Honorable Michael O'Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner

² Peter DeMarco, *Losing Laura*, Boston Globe Magazine (November 3, 2018), <https://www.bostonglobe.com/magazine/2018/11/05/losing-laura/WJrAFwMTYs1zwPfH5nTvGM/story.html>.

³ *Public Safety and Homeland Security Bureau Seeks Comment on Vertical (z-axis) Accuracy Metric Proposed by Nationwide Wireless Carriers*, PS Docket No. 07-114, Public Notice, FCC (September 10, 2018).



OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

December 27, 2018

The Honorable Amy Klobuchar
United States Senate
302 Hart Senate Office Building
Washington, DC 20510

Dear Senator Klobuchar:

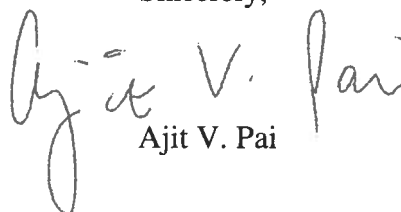
Thank you for your letter regarding the Commission's 911 rules. I agree that Americans need to have confidence that when they dial 911, emergency responders will be able to locate and assist them quickly. I appreciate your acknowledgment of recent Commission actions to help effectuate our shared goals of accurate location information for 911 calls.

One of the most significant 911 actions the Commission recently took was to begin the implementation of both Kari's Law, which ensures individuals can directly dial 911 when using multi-line telephone systems (MLTS), and section 506 of RAY BAUM'S Act, which calls for the Commission to examine the feasibility of requiring dispatchable location (including street address, floor level, and office or room number) for 911 calls from MLTS and other technology platforms. I have worked alongside Hank Hunt, Kari's father, to make Kari's Law a reality, and am pleased that in September we proposed rules to implement the law's direct dialing requirements for MLTS and to require dispatchable location from MLTS and other platforms.

Regarding wireless location accuracy, wireless carriers currently are required to provide either dispatchable location or coordinate-based location within 50 meters for 50% of 911 calls. These benchmarks will increase to 70% of wireless 911 calls by 2020 and to 80% by 2021. Carriers are required to provide live 911 call data on a confidential basis to demonstrate compliance, and it appears based on data we have received thus far that wireless carriers are meeting the current threshold. As carriers face increasingly rigorous benchmarks in the next couple of years, staff from the Commission's Public Safety and Homeland Security Bureau will continue to monitor progress and evaluate industry data to ensure compliance. Relatedly, the Bureau recently sought comment on the wireless industry's test bed report on vertical accuracy (z-axis), which is important to locate 911 calls originating from multi-story buildings. I agree with you that we must take a close look at what is feasible here, and the Bureau is currently evaluating the record to ensure that our requirements are sufficient to protect the public.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,



Ajit V. Pai



OFFICE OF
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

December 27, 2018

The Honorable Edward Markey
United States Senate
255 Dirksen Senate Office Building
Washington, DC 20510

Dear Senator Markey:

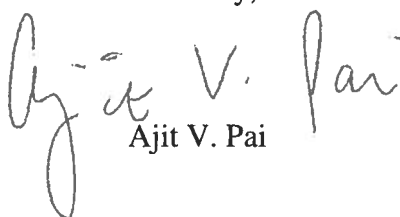
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