

Via Electronic Comment Filing System

October 17, 2019

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

Re: Notice of *Ex Parte*, PS Docket No. 07-114

Dear Ms. Dortch:

I am the Director of Emergency Communications of Southern Oregon (ECSO). I write to provide an operational perspective on the type of location information needed by 9-1-1 professionals to best carry out our mission to protect and save lives.

My agency processes 110,000 9-1-1 calls per year, with approximately 80% originating from cell phones. ECSO serves 220,000 people in Jackson County, with 11 incorporated cities, and 34 unincorporated communities.

Vertical location information for 9-1-1 callers from inside buildings could improve emergency response. The location information must be actionable, meaning that Public Safety Telecommunicators (PSTs) can quickly use it to assist the caller and direct responders to the scene. A “dispatchable location,” as defined by the FCC, remains the gold standard from an operational perspective. However, if wireless carriers are unable to provide a dispatchable location, and instead provide z-axis information, they should be required to make that information as actionable as possible by including an estimated a floor number.

A raw vertical estimate is of little operational value if it is relative to height above mean sea level (AMSL) or above ground level (AGL). 9-1-1 centers like mine simply do not have the resources to create and maintain indoor maps for buildings in our jurisdictions. Even if we did, we would not have the ability to translate AMSL or AGL to a floor, or visualize a three dimensional point in space.

Additionally, the information we receive from wireless carriers should enable us to do better for our law enforcement, fire, and EMS counterparts in the field than providing a height estimate that they then would try to match with their own devices. In order for 9-1-1 professionals to have the information they need to ensure that responders arrive as quickly as possible, they at least need a floor number estimate (e.g., “4th floor” rather than “12 meters AMSL”). Accordingly, as you contemplate rules for a z-axis metric, please consider requiring wireless carriers to provide a floor number as part of the z-axis information. Requiring wireless carriers to provide actionable location information about 9-1-1 callers will save lives.

As an example, imagine dialing 9-1-1 during a life threatening, time sensitive emergency such as a heart attack, choking victim, a person threatening you with a weapon, or any number of other scenarios. As the responders attempt to find you, the best information they could have would be the specific room you are in. If that isn't possible, and responders are relying upon a z-axis estimate, responders should at least be provided with a specific floor number for starting their search to find you. Any added time trying to locate you decreases your chance of survival during a life threatening emergency.

By adopting the rule in 2015 requiring carriers to provide 9-1-1 centers with the location of a 9-1-1 caller inside a building, it is clear the FCC recognizes the importance of improved location accuracy in building. As you define the z-axis metric, I urge you to ensure our responders have the best possible information to find a victim during an emergency by requiring a floor number as part of the z-axis.

Thank you for taking my views into consideration.

Margie Moulin
Director, Emergency Communications of Southern Oregon