



Via Electronic Comment Filing System

October 22, 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 writing regarding the pending FCC action concerning 9-1-1 location accuracy requirements and to express concerns with the “z-axis metric” level of accuracy. I am the Police Support Services Manager of the Redmond (WA) Police Department. We are part of the King County E9-1-1 system and provide emergency call taking and dispatching services for the Redmond and Duvall Police Departments. In 2018, our agency processed 20,138 9-1-1 calls with approximately 60% originating from cell phones.

The 2015 FCC adopted rules require carriers to provide 9-1-1 centers such as Redmond with the location of a caller when inside a building by either providing a dispatchable location – a street address plus room, floor, suite- OR “z-axis” technologies to estimate the height of a 9-1-1 caller. The FCC is posed to adopt an order that, in my view, will not serve the public well.

I have two significant concerns. First, the FCC proposed z-axis metric of +/- 3 meters is not a helpful description of a caller’s location. Seconds count. If you’ve ever called 9-1-1, this should resonate with you. If first responders in the 9-1-1 Center (Public Safety Telecommunicators) or in the field (police officers, firefighters, and medical personnel) must spend any time trying to cross reference a location such as “40 meters above sea level,” the impact is seconds or minutes lost in influencing a positive outcome for the caller. This may literally be the difference between life and death. Adding complexity to 9-1-1 is simply unacceptable. We need immediate access to a recognizable location such as a floor number.

The second concern is the potential that carriers may dispense with providing a dispatchable location altogether and instead provide the non-actionable z-axis metric as stated in the proposal. This would be a significant step backwards for 9-1-1 and, again, it is simply unacceptable. A dispatchable location, as defined by the FCC, is the gold standard from an operational perspective.



I urge you to consider this input and that of my 9-1-1 colleagues from across the country and consider requiring wireless carriers to provide a floor number as part of the z-axis information. Carriers must deliver actionable location information about 9-1-1 callers. The public expects us to know where they are, and we cannot do that without your help.

Thank you,

A handwritten signature in black ink, appearing to read "Sheryl Mullen". The signature is fluid and cursive, with the first name "Sheryl" and last name "Mullen" clearly distinguishable.

Sheryl Mullen
Police Support Services Manager
Redmond Police Department