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February 25, 2019

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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

On February 22, 2019, I spoke by phone with Public Safety and Consumer Protection Advisor Zenji Nakazawa, of the Office of Chairman Pai, to discuss the draft Fourth Further Notice of Proposed Rulemaking regarding the above-captioned wireless 9-1-1 location accuracy proceeding.[1] APCO appreciates the Commission's release of the draft FNPRM and looks forward to providing comments on the final FNPRM.

Vertical location information for 9-1-1 callers could improve emergency response. At the same time, for 9-1-1 Emergency Communications Centers (ECCs), 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. In this regard, the draft FNPRM asks whether the Commission should specify that CMRS providers must report z-axis information as height above ground level (AGL), as opposed to above mean sea level (AMSL).[2] As APCO previously stated, "[v]ertical location information provided as a value relative to mean sea level is not actionable for public safety. If a z-axis metric is adopted, it should include floor level information," consistent with the Commission's direction that a z-axis metric would serve as a backstop for identifying floor level.[3] The difference would mean that PSTs would receive, for example, "4th Floor" as opposed to "12 meters AGL" (within permitted confidence and uncertainty levels).

Therefore, APCO respectfully requests that the draft FNPRM be revised to include the following additional question: "Should the Commission specify that CMRS providers must identify the floor level when reporting z-axis

[1] Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, *Draft Fourth Further Notice of Proposed Rulemaking*, FCC-CIRC1903-03 (rel. Feb. 22, 2019) ("draft FNPRM").
[2] *Id.* at para. 14.
[3] Comments of APCO, PS Docket No. 07-114, at 5 (filed Oct. 1, 2018) (citing Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, *Fourth Report and Order*, 30 FCC Rcd 1259, para. 162 (2015)).

information?" Identifying the floor level is qualitatively different from achieving floor level accuracy, and would better ensure that z-axis information is actionable for ECCs, so that PSTs can more quickly and accurately direct first responders to 9-1-1 callers during emergencies.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically with your office.

Respectfully submitted,

/s/
Jeffrey S. Cohen
Chief Counsel

CC (via email):
Zenji Nakazawa