

**BRIAN P. KEMP**  
Governor



**CHRIS WIGGINTON**  
Director

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 the Instructional Services Manager for the Georgia Public Safety Training Center. 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.

While my agency does not directly dispatch 9-1-1 calls, we are responsible for providing training to public safety Telecommunicators from more than 200 emergency communications centers, serving 10.5 million people. Our constituents serve in large urban, vast mountainous areas in North Georgia, sparsely populated farmland, beach towns along the southeastern coast, and everything in between. In fiscal year 2019, we trained 509 new Telecommunicators and coordinated the training of approximately 220,000 public safety professionals from around the country.

Location accuracy is of critical importance to every student that trains at our facility. Not only will accurate, actionable location information help reduce response times, but it can help responders find people trapped in working fires, or pinpoint the location of responders needing rapid assistance in dynamic life-threatening situations.

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

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location, and instead provide z-axis information, they should be required to make that information as actionable as possible by including an estimated 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 simply do not have the resources to create and maintain indoor maps for buildings in our jurisdictions. Even if they did, they would not have the ability to translate AMSL or AGL to a floor, or visualize a three dimensional point in space. Additionally, the information received from wireless carriers should enable Telecommunicators 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.

Thank you for your consideration.

Angela R. Bowen



Instructional Services Manager  
Georgia Public Safety Training Center

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