

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of Unified Communications

Muriel Bowser
Mayor



Karima Holmes
Director

Via Electronic Comment Filing System

October 24, 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 Karima Holmes, Director of the District of Columbia's Office of Unified Communications. We are DC's 911 Call Center.

I want to comment on the need for true vertical location information for 9-1-1 callers from inside buildings to improve emergency response. This perspective is a pragmatic view as our Universal Call Takers for medical, fire and police emergencies use location information to assist the caller and direct responders to the scene, so the location information we need must be a "dispatchable location". We understand that this information is provided to our agency by the wireless carriers, however, if they are unable to provide a dispatchable location, and instead provide z-axis information, the provided information must be something a call taker can relay into our dispatch systems for responders, while being able to verbally verify it with the caller in need.

A dispatchable location as defined by the FCC is what we need as emergency communications professionals to properly operate. My agency processes 1.2million 9-1-1 calls per year, with approximately 80% originating from cell phones. The need for a vertical estimate is needed but if the estimate is given in indecipherable terms like XXXX above mean sea level (AMSL), it does not help articulate to the caller, call taker nor the responder of where the emergency is occurring. It is realistically difficult for 9-1-1 centers to create and maintain indoor maps for buildings in our complex jurisdictions to house information like AMSL measures. Even if we did, we would not have the ability to translate AMSL or above ground level (AGL) to a floor or visualize a three-dimensional point in space.

With speed and accuracy at the core of 911 call taker; it would be ideal for emergency communication centers to have at least a floor number or wing specification (e.g.. "4th floor" rather than "12 meters AMSL"). I do believe having a more specific location that can be translated in lay terms, from our call takers to the caller and ultimately to the responder(s) will help sharpen the amount of time verifying the location and getting help to the correct location.

Thank you for taking my views into consideration.

Karima Holmes
Director
DC Office of Unified Communications

