



# CITY OF RICHMOND

DEPARTMENT OF EMERGENCY COMMUNICATIONS

STEPHEN M. WILLOUGHBY  
DIRECTOR

*Via Electronic Comment Filing System*

October 28, 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 for the City of Richmond, Virginia. 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 processed 271,712 9-1-1 calls in 2018, with approximately 40% originating from cell phones. Having a population of nearly one-quarter of a million people, Richmond is the seat of government for the Commonwealth of Virginia, home to Virginia Commonwealth University and its 31,000 students, and headquarters to eight of the top 500 corporations in the United States.

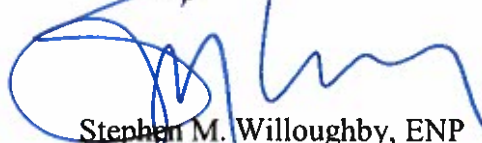
Because of Richmond's highly urbanized city environment, vertical location information for 9-1-1 callers from inside buildings could greatly improve emergency response. The location information must be actionable, meaning that public safety personnel can quickly use it to assist the caller and direct 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 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 thousands of multiple level buildings in our city. 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 police, fire, and emergency medical service counterparts in the field than providing a height estimate that they then would try to match with their own devices, wasting precious time. 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. "4<sup>th</sup> 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 taking my views into consideration.

Sincerely,



Stephen M. Willoughby, ENP  
Director of Emergency Communications  
City of Richmond, Virginia