



**BOARD OF COUNTY
COMMISSIONERS**

WWW.BAYCOUNTYFL.GOV

840 WEST 11TH STREET
PANAMA CITY, FL 32401

COMMISSIONERS:

**TOMMY HAMM
DISTRICT I**

**ROBERT CARROLL
DISTRICT II**

**WILLIAM T. DOZIER
DISTRICT III**

**KEITH BAKER
DISTRICT IV**

**PHILIP "GRIFF" GRIFFITTS
DISTRICT V**

**ROBERT J. MAJKA JR.
COUNTY MANAGER**

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:

My name is Mark Bowen and I am the Chief of Emergency Services For Bay County Fire/Rescue in Bay County, Florida. I too am writing 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 processes 200,000 9-1-1 calls per year, with approximately 90% originating from cell phones. [We are a vacation destination with **many** high-rises.]

In an FCC Press release dated March 15, 2019, it is stated "The Commission tentatively concluded that such a location accuracy metric—within three meters above or below the phone—would be sufficiently accurate to identify the caller's floor level in most cases and would be technically feasible under the timeframes established in the Commission's Enhanced 911 rules".

3 Meters is almost 10 feet, so 10 feet below or above the caller would be 3 floors to choose from in an emergency situation.

Vertical location information for 9-1-1 callers from inside buildings will 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 location, and instead provide z-axis information, they should be required to make that information as actionable as possible by including a floor number, or partnering with a company that can.

3 milestones of 2015 have also not been met or completed:

1. Provide a status of the NEAD for dispatchable location to assess if it is on track.

"An important conclusion of this testing is that reference point density in the NEAD database is not yet at sufficient levels to assure optimum performance. Low reference point density was found to cause instances where erroneous civic address details were reported, incorrect street addresses of neighboring buildings were reported, or no civic addresses were reported at all". (E911 location test bed dispatchable location report summary, Atis test bed program management)

CTIA themselves noted: "... that third-party adoption and scalability issues remain substantial challenges to National Emergency Address Database (NEAD)-based dispatchable location solutions".

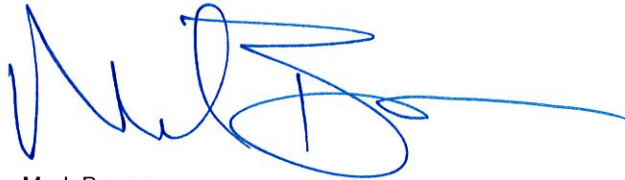
2. Implement a test-bed to evaluate barometric pressure (BP) sensor-based altitude (z-axis) technologies.

The test beds were in controlled environments, but how does it work outside of that? We do not know because #3 below has not been tested live.

3. Wireless carriers must begin providing uncompensated BP measurements with 911 calls to PSAPs starting August 3, 2018.

To be a true dispatchable location, the floor number should be presented with the address and not the z-axis metric of 3 meters AMSL with PST's playing a guessing game.

Thank you for taking my views into consideration.

A handwritten signature in blue ink, appearing to read 'Mark Bowen', with a long horizontal flourish extending to the right.

Mark Bowen
Chief of Emergency Services
Bay County Fire/Rescue