



International Association of Fire Chiefs

4795 Meadow Wood Lane, Suite 100 • Chantilly, VA 20151
Tel: 703.273.0911 • Fax: 703.273.9363 • IAFC.org

April 30, 2019

VIA ELECTRONIC FILING

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

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

Dear Ms. Dortch,

On April 26, 2019, IAFC President Dan Eggleston and IAFC staff member Brandon Allen met with Public Safety and Homeland Security Bureau (Bureau) Chief Lisa M. Fowlkes and Deputy Chief David Furth. The participants discussed the challenges posed by an auction of the T-Band, particularly the lack of alternative spectrum options for public safety incumbents. The representatives touched upon the pitfalls of spectrum relocation and the impact such an event will have on affected jurisdictions. Also mentioned were the many benefits that the T-Band provides to public safety as a reliable communications resource.

The IAFC representatives thanked the Bureau for its proposed ± 3 meter metric for vertical location accuracy detailed in the *Fourth Further Notice of Proposed Rulemaking* (FNPRM).¹ During the discussion, the representatives suggested that the FCC explore narrowing the margin of error over a reasonable timeframe as technology develops. The security of the technologies and methods used to determine dispatchable location, including that of the National Emergency Address Database, was also stressed as being of importance to the IAFC.

Included in the discussion was Next Generation 911, which will upgrade the legacy technology of the nation's 911 system. While Next Generation 911 will bring several benefits to the fire and emergency service, the IAFC representatives presented the perspective that call takers must be trained on content analysis and transmittal so that an incident command station is not flooded with non-actionable data.

¹ See *Draft Wireless E911 Location Accuracy Requirements*, Fourth Further Notice of Proposed Rulemaking, PS Docket No. 07-114.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in the Electronic Comment Filing System and provided to the meeting attendees.

Sincerely,

Brandon W. Allen
Manager, Government Relations

cc: Lisa M. Fowlkes
David Furth