



INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS®

HAROLD A. SCHAITBERGER
General President

EDWARD A. KELLY
General Secretary-Treasurer

May 15, 2020

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: E911 Vertical Location Accuracy Requirements
Public Safety Docket No. 07-114

Dear Chairman Pai:

Last November, I was proud to stand before the Commission, representing more than 320,000 professional fire fighters and emergency medical responders, to support the Commission's Fourth Report and Order establishing vertical location requirements for E911 emergency calling. As I said at the time, the adoption of these rules was a goal we and others in public safety have supported for many years because it will not only save the lives of citizens in distress but also improve the health and safety of dedicated first responders dispatched to assist them.

We also supported the Commission's Fifth Further Notice of Proposed Rule Making with the longer-term objective of improving the three-meter vertical accuracy metric and exploring the potential to provide individual floor identification and labeling. Given the Commission's stated purpose of adopting its Fifth Further Notice in order to continue to improve the vertical location requirements, it has been disappointing to see proposals submitted in response to the Further Notice that instead seek to weaken the accuracy requirements agreed upon only a few months ago. These new proposals largely revisit accuracy metrics rejected as inadequate back in 2018 both by public safety and the Commission. The process of reaching a consensus position on these important issues is too demanding on key stakeholders to constantly revisit the decision year after year.

As we are all painfully aware, our fire fighters as well as other first responders are serving on the frontlines in battling COVID-19. As such, our time and attention has been and will remain focused on more pressing matters for many months to come. Relitigating hard-fought agreements on vertical location accuracy, while important to our members' health and safety, is not where any of us should be investing our limited time and resources.

It appears from recent filings that some carriers have begun taking important steps to provide public safety with vertical location capabilities in a timely manner,¹ but we would hope that others, as well as handset and operating system providers, will also take the needed actions to comply with the requirements the Commission established in its carefully structured Order.

Finally, IAFF also supports BRETSA's recent request² that test results of various vertical location technologies be made public with the same detail and transparency that prior test results have been.³ To the extent these tested solutions represent capabilities public safety is expected to support and rely upon, we and the public at large cannot meaningfully assess them without a full understanding of the level of performance.

Let me again express my personal appreciation for the diligent efforts of the Commission staff and Commissioners in pursuing improved location capabilities, both horizontal and vertical, over these many years.

Sincerely,



Harold A. Schaitberger
General President

Copied:

Commissioner Jessica Rosenworcel
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Geoffrey Starks

¹ See, e.g., Letter from AT&T Services, Inc. and NextNav, LLC, PS Docket No. 07-114 (May 8, 2020) (listing the 105 cellular market areas where NextNav is deploying its z-axis network to support AT&T, FirstNet and other emergency services).

² See BRETSA Response in Opposition to Confidentiality Request – CTIA Stage Za Test Bed Report, PS Docket No. 07-114 (May 12, 2020).

³ See *Report on Stage Z, 911 Location Testbed*, LLC, PS Docket 07-114 (Aug. 3, 2018).