Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Wireless E911 Location Accuracy Requirements	)	PS Docket No. 07-114

COMMENTS OF AT&T

AT&T Services, Inc., on behalf of itself and its affiliates (collectively, "AT&T"), submits these comments in response to the Federal Communications Commission's ("FCC" or "Commission") *Fourth Further Notice of Proposed Rulemaking* seeking comment on a proposed vertical ("z-axis") metric of plus or minus three meters relative to the handset.[1]

I. INTRODUCTION

AT&T is committed to working with stakeholders across the 911 ecosystem to advance the Commission's goals to improve location accuracy for wireless 911 calls. To that end, AT&T supports the establishment of a z-axis location metric that will more accurately enable first responders to identify the floor level for most 911 calls, reduce emergency response times, and save lives. With certain clarifications to the proposed rules, the Commission can ensure that providers are able to successfully implement the new metric and help improve the routing of 911 calls in accordance with the Commission's compliance benchmarks. Successful implementation of the new metric will also depend on the involvement of original equipment manufacturers ("OEMs") and operating system providers, which will need to develop and incorporate the new

[1] *Wireless E911 Location Accuracy Requirements*, Fourth Further Notice of Proposed Rulemaking, PS Docket No. 07-114, FCC 19-20 (Mar. 18, 2019) ("*FNPRM*").

z-axis technologies into their handsets. Finally, AT&T will ensure that vertical location data associated with 911 calls is only used for emergency response or other lawful purposes.

II. AT&T SUPPORTS THE COMMISSION'S PROPOSED 3-METER LOCATION ACCURACY METRIC.

AT&T is in favor of the Commission's proposal to adopt a z-axis metric based on a 3-meter standard.[2] Although the 9-1-1 Location Accuracy Technologies Test Bed ("CTIA Test Bed") results did not indicate with certainty that a 3-meter metric was currently achievable in all scenarios,[3] AT&T supports adoption of this requirement as it will give the industry certainty and advance the development process necessary to meet the 2021 and 2023 vertical location accuracy benchmarks in the *Fourth Report & Order*.[4] At this point, the biggest determinant to meeting the vertical accuracy metric is incorporating the technology into the handsets to allow the z-axis measurements to be delivered to the public safety answering points. This will require that handset operating system providers and OEMs work diligently to incorporate the new technology into the handsets to reach these benchmarks. And because none of the z-axis technologies tested in the CTIA Test Bed are available in commercial handsets today, the Commission should not consider accelerating the deployment timelines.

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2 *Id*. at ¶ 10.

3 *See* Letter from Scott Bergmann, CTIA, *et al*. to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114 (filed Aug. 3, 2018) (noting that further testing in all regions and morphologies would be needed to confirm performance of z-axis solutions in live 911 calling environments).

4 Wireless E911 Location Accuracy Requirements, Fourth Report & Order, 30 FCC Rcd 1259 (2015) ("*Fourth R&O*").

To ensure that the new standard is clear and achievable, the Commission should revise the z-axis metric in proposed rule 20.18 to read: "within 3 meters above or below (plus or minus 3 meters) the handset for 80% of all wireless E911 calls made from z-axis capable devices."[5]

The Commission should also clarify how providers can demonstrate compliance with the new metric. Carriers should be able to show compliance by 1) validating the technology in the CTIA Test Bed; 2) deploying the technology consistent with such testing, and 3) asserting that they are in compliance with the Commission's 2021 and 2023 benchmarks from the *Fourth Report & Order*.[6]

While carriers will provide z-axis location data that meets the metric, first responders should be responsible for translating that data into actionable information. Carriers should only be required to provide z-axis location information as height above mean sea level ("MSL") rather than height above ground level ("AGL") or a specific floor level. MSL provides the most reliable method for measuring compliance as it does not vary by building characteristics or unique geography like AGL. Indeed, converting MSL data to AGL data requires familiarity with variations in terrain and specific structure characteristics. First responders are more familiar with the terrain and structures in their jurisdictions and are in the best position to use the z-axis data to identify emergency caller location in a given structure. Thus, to minimize the risk of error, it is appropriate that carriers provide MSL data that first responders can use to precisely locate emergency callers.

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5 *See FNPRM*, Appendix A.

6 The *Fourth R&O* requires nationwide carriers to deploy z-axis technology that achieves the Commission-approved z-axis metric to cover 80 percent of the population in the top 25 Cellular Market Areas ("CMAs") by August 3, 2021, and the top 50 CMAs by 2023. *Fourth R&O* at 3.

III. Z-AXIS DATA ASSOCIATED WITH A SPECIFIC 911 CALL WILL ONLY BE USED FOR RESPONDING TO 911 CALLS.

Today, the horizontal location information (x- and y-axis data) collected for individual 911 calls is used exclusively for responding to emergency calls, or for responding to valid law enforcement requests for the information.[7] Similarly, when vertical location information is generated for emergency calls, the information should be subject to the same exclusivity and used only for responding to the emergency calls or valid law enforcement requests.

IV. CONCLUSION

AT&T is committed to providing the most accurate, actionable location information, including vertical location information, to help public safety respond to wireless 911 calls. AT&T encourages the Commission to clarify its proposed z-axis rules to ensure certainty for all stakeholders in the 911 ecosystem.

Respectfully submitted,

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[7] *See, e.g.,* 47 C.F.R. § 20.18(i)(4)(iv) (NEAD Use certification).