

July 9, 2020

BY ELECTRONIC DELIVERY

The Honorable Ajit Pai, FCC Chairman
The Honorable Michael O'Rielly, FCC Commissioner
The Honorable Brendan Carr, FCC Commissioner
The Honorable Jessica Rosenworcel, FCC Commissioner
The Honorable Geoffrey Starks, FCC Commissioner

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20544

Re: PS Docket No. 07-114, Wireless 9-1-1 Location Accuracy

Dear Ms. Dortch:

From its inception in 2012, the Safer Buildings Coalition has been at the forefront of advancing the idea that wireless technology makes people inside buildings safer. In this filing, we fully support the position advanced by the National Public Safety Telecommunications Council (NPSTC) and other public safety organizations, such as the International Association of Fire Chiefs (IAFC), on the recently released draft *Sixth Report and Order* and its adherence to the vertical location accuracy requirement that was previously adopted by the Commission mandating that wireless carriers provide z-axis location information to public safety that is accurate within +/- 3 meters for at least 80% of calls to 9-1-1.

Safer Buildings Coalition

The goal of the Safer Buildings Coalition is to ensure the public can use their mobile phones to call for help, be notified when there is an emergency, and know that emergency personnel can communicate inside the building where the emergency is taking place.

The Safer Buildings Coalition is an independent, non-profit organization focused on advancing policies, ideas and technologies that ensure comprehensive in-building communications capabilities for public safety personnel and the people they serve.

The Safer Buildings Coalition leads in fire code development, working with our members and key stakeholders to propose and advocate for changes to model fire codes and standards produced by the International Code Council (ICC) and the National Fire Protection Association (NFPA) related to in-building public safety communications. We also engage in thought leadership, education, and advocacy. In-building wireless connectivity is key to public safety and in turn to the general public which public safety protects. A goal of the Safer Buildings Coalition is to help our stakeholders stay at the forefront of in-building cellular and public safety wireless communication innovations and opportunities. To this end, we foster constructive collaboration among wireless industry stakeholders, such as wireless carriers, commercial real estate and end users, manufacturers, distributors, integrators, engineering and design, third-party operators, and others to further the mission of making buildings safer for first responders and the general public they serve.

The public safety community has clearly indicated that 3-meter accuracy is the minimum threshold necessary to reliably locate wireless callers in distress. Further, the provision of 3-meter accuracy for anything less than 80% of calls from z-axis capable handsets would be insufficiently accurate to be useful as actionable information to support first responders in the field. The Safer Buildings Coalition agrees with NPSTC and does not support suggestions that the Commission should wait any further for the identification and verification testing of additional or improved location technologies. We do not support suggestions that the Commission wait for a reduction in the prevalence of the COVID pandemic. The general public and public safety have already waited far too long for the provision of highly accurate location information with wireless calls to E911 emergency services. We also support the June 24 filing by the National Sheriffs' Association (NSA) calling for a nationwide basis at the same level (+/- 3 meters at 80% of all calls to include vertical information) versus some suggestions of a 50% requirement of the 9-1-1 calls.

The Safer Buildings Coalition agrees with NPSTC's support of the Commission's decision to expand its wireless location accuracy requirements to require that z-axis data be provided nationwide by April 2025. Mandating nationwide coverage should not be burdensome for wireless carriers given the fact that multiple location technology vendors, including Apple, Google NextNav, and Polaris have indicated that their services either already are or soon can be made available on a nationwide basis. The near-term availability of +/- 3-meter accurate vertical location services will greatly assist first responders who are the *feet on the street* responding to a call for help. Timing is key in a life-or-death situation in answering and responding to a 9-1-1 call. Expedient arrival of first responders requires that they have accurate information on the location where assistance is needed. For multi-story buildings, that not only requires the location of the building, but also the floor level where the caller is located.

Given the importance of highly accurate vertical location information, NPSTC also urges the Commission to revise its draft order to take further steps to ensure that there are continual improvements in vertical location accuracy. For example, NPSTC strongly supported tightening the vertical metric to 2 meters, or even 1 meter if possible, in the relatively near future. As NPSTC has previously observed, at least one location technology vendor has already demonstrated accuracy of better than 2 meters, indicating that the time frame required for tightening the requirement may not be lengthy. Thus, to facilitate the rapid implementation of more accurate capabilities, the Commission should consider establishing additional milestone dates by which 2-meter accuracy will be required, potentially following the current 3-meter milestones by two or three years.

In closing, the Safer Buildings Coalition fully supports the Commission's efforts to ensure that when a caller calls 9-1-1 from a multi-story building, they will have the confidence and knowledge that first responders will be able to locate the floor and location on that floor where they are located.

Respectfully Submitted,

Alan Perdue

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