



August 21, 2020

VIA ELECTRONIC FILING

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

Re: Wireless E-9-1-1 Location Accuracy Requirements, PS Docket No. 07-114
Status Report on Stage Zb Testing

Dear Ms. Dortch:

CTIA, on behalf of the 9-1-1 Location Technologies Test Bed, LLC (Test Bed), wishes to inform the Commission that the next round of testing of 9-1-1 vertical (Z-axis) location technologies, Stage Zb, will be delayed due to the impact of COVID-19.¹ As described below, the response to the COVID-19 pandemic is restricting building access and affecting the ability to safely and effectively test Z-axis technologies. The Test Bed intends to resume Stage Zb when testing can be safely accomplished and property managers agree to provide access to buildings in the test cities.

In accordance with ANSI-accredited ATIS Standards, the Test Bed conducts wireless 9-1-1 indoor location accuracy testing in buildings that represent a broad diversity of indoor environments, including office buildings, residential buildings (both apartment buildings and condominiums), hotels, and event venues, in a cross-section of morphologies.² The testing process itself involves simulated 9-1-1 calls placed from different operational environments within each building by field collection teams consisting of engineers, project managers, and subject matter experts over extended periods of time. These testing locations represent different areas within buildings from which a 9-1-1 call might be initiated, such as tenant spaces in residential buildings and office spaces. The Test Bed's vendor selects and surveys candidate buildings and is then responsible for procuring access rights from property managers.

The response to the COVID-19 pandemic has created significant challenges to safely gaining access to test buildings for field collection teams across multiple test cities, including Atlanta, Houston,

¹ This test campaign is part of the ongoing effort by CTIA and the nationwide wireless providers (AT&T Mobility, T-Mobile USA and Verizon Wireless, collectively "providers") to identify technologies that can meet the Commission's Z-axis performance thresholds.

² See, e.g., 911 Location Test Bed, LLC, Report on Stage Z, at 3 (Aug. 2018) (attached to Letter from Scott K. Bergmann, Senior Vice President, Regulatory Affairs, CTIA *et al.*, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114 (filed Aug. 3, 2018)).



Philadelphia, Chicago, Minneapolis, New York, San Francisco, and Seattle.³ Each stage of testing has typically involved access to roughly 50 buildings across multiple regions and morphologies. After several months and outreach to over 450 building managers, only three buildings have provided positive feedback. In residential buildings, most building owners are not willing to consider testing at this time, and access to individual tenant units poses a further challenge.⁴ In commercial buildings, property managers have been largely unresponsive or expressed similar reservations about testing at this time.⁵ The COVID-19 pandemic has literally stalled access to building interiors that are essential to the testing process. The Test Bed appreciates that the *Sixth Report and Order* recognized that the COVID-19 pandemic could impact testing, and ensuring the safety of residents, building occupants, and the field collection teams is the Test Bed's top priority.⁶

³ See, e.g., Press Release, City of Atlanta, Georgia, *Mayor Keisha Lance Bottoms Orders City's Phased Reopening Plan to be Moved Back to Phase I* (July 10, 2020), <https://www.atlantaga.gov/Home/Components/News/News/13408/672> (ordering the City of Atlanta to move back from Phase II to Phase I, where non-essential City facilities remain closed, residents are encouraged to stay home except for essential trips, and teleworking is strongly encouraged, after the State of Georgia recorded a record high number of COVID-19 cases in a single day); see also New York State, *New York Forward Statewide Guidelines*, <https://forward.ny.gov/statewide-guidelines> (last visited Aug. 19, 2020); New York State Department of Health, *Safety Plan Template*, https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/NYS_BusinessReopeningSafetyPlanTemplate.pdf (last visited Aug. 19, 2020) (requiring each business or entity to develop a written Safety Plan outlining how the workplace will prevent the spread of COVID-19 through social distancing, the provision of protective equipment, health screening, hygiene and cleaning requirements, and other requirements); San Francisco, California, *Stay Safe. Stay Home*. (last updated August 17, 2020), <https://sf.gov/stay-home-except-essential-needs> (noting that only some types of businesses can be open during the coronavirus pandemic and encouraging working from home as long as allowed by employers); Seattle, Washington, Office of the Mayor, *Covid-19: Reopening Businesses*, <https://www.seattle.gov/mayor/covid-19/covid-19-reopening#phase2> (last visited Aug. 19, 2020) (noting that Seattle remains in Phase II of Washington's reopening plan, where some businesses are still restricted from opening); Public Health Order, City of Chicago, Illinois, *Order of the Commissioner of Health of the City of Chicago No. 2020-9 (Phase IV: Gradually Resume – Fourth Amended and Re-Issued)* (July 24, 2020), <https://www.chicago.gov/content/dam/city/sites/covid/health-orders/CDPHOrder2020-9-CautiouslyReopen-7-24-2020.pdf> (“cautiously reopens Chicago's businesses” as long as businesses make certain health measures mandatory).

⁴ For example, the Test Bed's vendor has reported that property managers of residential buildings have said: “The property is currently closed to visitors. No non-residents allowed other than essential contractors” and “You cannot test or be on-site right now. We need to maintain the common spaces for the residents.”

⁵ For example, the Test Bed's vendor has reported that property managers of commercial buildings have said: “We are currently trying to keep access to the building restricted to tenants and essential building personnel during COVID. When things calm down we can revisit” and “We are not having any new activities or projects onsite right now. Mostly likely though end of the year due to Covid-19.”

⁶ *Wireless E911 Location Accuracy Requirements*, Sixth Report and Order and Order on Reconsideration, PS Docket No. 07-114, FCC 20-98, at ¶ 14 n.35 (rel. July 17, 2020). As the Commission encouraged providers to work with public



In light of the forgoing challenges, the Test Bed has made the difficult decision to postpone Stage Zb testing until testing can be safely and effectively accomplished within buildings in the test cities. We will inform the Commission when testing can safely resume.

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Please do not hesitate to contact the undersigned with any questions.

Sincerely,

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safety agencies in the relevant jurisdictions to facilitate the testing process as much as possible, the Test Bed has collaborated with APCO and NENA to support the Test Bed's vendor efforts to emphasize the importance of testing 9-1-1 location accuracy solutions within buildings. Despite these joint efforts, the Test Bed's vendor and building managers have expressed significant concerns about the safety risks to building occupants and the field collection teams.