



# INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS®

HAROLD A. SCHAITBERGER  
General President

EDWARD A. KELLY  
General Secretary-Treasurer

September 13, 2019

The Honorable Jessica Rosenworcel, Commissioner  
Federal Communication Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: PS Docket No. 07-114, Wireless E911 Location Accuracy Requirements

Dear Commissioner Rosenworcel,

The International Association of Fire Fighters (IAFF) applauds your interest in improving 911 caller location information and ensuring actionable data is available to public safety as soon as possible. On behalf of the more than 317,000 career professional fire fighters and emergency medical responders, I urge you to support setting the 'Z' axis metric for 911 at 3 meters in the above-captioned proceeding and to require this capability be made available by the currently existing deadlines. Recent filings by the wireless carriers suggest a troubling effort to delay long-agreed milestones and to weaken metrics, particularly as it relates to vertical location accuracy within 3 meters. Compliant results have been demonstrated repeatedly over the past seven years of testing, and the record indicates that carriers can implement this technology in a timely and efficient manner.

All parties in the current indoor location proceeding agree that vertical location information must be sufficiently accurate to permit emergency responders to identify the floor of a wireless caller to E911. The time difference between an emergency response to a precise location (including altitude) as compared to a vague search area is often the difference between life and death. In the time it takes to locate a rescue situation, medical emergency, an ignited fire in a multi-story building, or finding one of our own circumstances can intensify radically, placing victims and responders at extreme risk, including death.

The real significance of rapid delivery of vertical location information was proven by IAFF members using actual field tests in San Francisco in July 2014. San Francisco Fire Fighters and IAFF Local 798 working with the San Francisco Fire Department and the City of San Francisco Department of Emergency Management Division of Emergency Communications conducted real-world dispatch tests in multistory urban structures. These tests provided a clear and measurable validation of the Commission's conclusion that dispatch with vertical location information significantly improves emergency response time. The time difference between an emergency dispatch to a precise vertical location in competition with an indefinite search area is enormous (up to 10x in some tests). These tests clearly indicate that vertical altitude information can provide a substantial improvement in search effectiveness in multistory structures, even without a precise floor number or a dispatchable address.

In addition to protecting the public, improved indoor location information, mainly vertical

location, can help protect emergency responders. The same technology that allows PSAPs to identify the vertical location of a caller in distress will also help locate downed rescuers. To effectively protect the public, we also need to protect the fire fighters and paramedics with a duty to respond. In both cases, the provision of reliable and accurate vertical information is necessary to locate citizens in distress and helps ensure the safety of those dispatched to aid them.

The IAFF has also supported the concept of an address-based dispatchable location. The Commission afforded the wireless carriers four years to introduce and prove the utility of dispatchable location technology. Unfortunately, as the NEAD dispatchable location Test Bed results have demonstrated, achieving an accurate dispatchable location has a long way to go before it can be a useful tool for dispatchers and responders. Further, the NEAD test results suggest that the Commission's current NEAD compliance metrics may be woefully inadequate to provide even minimal levels of dispatchable location performance. If address-based dispatchable locations are ever to become an acceptable location alternative, the Commission should start a proceeding to explore what compliance metrics are appropriate and what technical improvements are required to achieve that reality. Until such time, we need accurate Z-axis availability as soon as possible.

The IAFF believed we were going to realize 3-meter vertical accuracy with the Commission's 2015 Report & Order in this continuing proceeding. I request your support for 3-meter vertical accuracy in the next Report & Order to help us fulfill our mission of protecting the public while also protecting the lives of responders. Three (3) meters is achievable now, can easily be implemented, will significantly speed response and most importantly, will save lives.

Thank you for your attention to this critical public safety matter and your continued commitment to improving the communications needs of our nation's frontline emergency responders.

Sincerely,

A handwritten signature in blue ink that reads "Harold A. Schaitberger". The signature is fluid and cursive, with the first name "Harold" being the most prominent part.

Harold A. Schaitberger  
General President

Copy to:     The Honorable Ajit Pai, Chairman  
              The Honorable Michael O'Rielly, Commissioner  
              The Honorable Brendan Carr, Commissioner  
              The Honorable Geoffrey Starks, Commissioner