



EX PARTE OR LATE FILED

FEDERAL WAY POLICE DEPARTMENT
33325 8th Avenue South
Federal Way, Washington 98003-6325
(253) 835-6700 www.cityoffederalway.com

Jim Ferrell, Mayor
Andy J Hwang, Chief of Police

October 21, 2019

Received & Inspected

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

OCT 29 2019

FCC Mailroom

Re: Notice of *Ex Parte*, PS Docket No. 07-114

Dear Ms. Dortch:

I am writing you to provide an operational perspective on the type of location information needed by 9-1-1 professionals to best carry out our mission to protect and save lives.

My agency responds to 77-80K 9-1-1 calls per year, with an ever increasing percentage originating from cell phones. Our city is comprised of a wide variety of buildings, businesses, open spaces, and large residential areas. We also have many multifamily dwellings throughout the city. The diversity of our structures makes it challenging to pinpoint locations.

Vertical location information for 9-1-1 callers from inside buildings could improve emergency response. The location information must be actionable, meaning that Public Safety Telecommunicators (PSTs) can quickly use it to assist the caller and direct responders to the scene. A "dispatchable location," as defined by the FCC, remains the gold standard from an operational perspective. However, if wireless carriers are unable to provide a dispatchable location, and instead provide z-axis information, they should be required to make that information as actionable as possible by including an estimated floor number.

A raw vertical estimate is of little operational value if it is relative to height above mean sea level (AMSL) or above ground level (AGL). 9-1-1 centers like ours simply do not have the resources to create and maintain indoor maps for buildings in our jurisdictions. Even if they did, they would not have the ability to translate AMSL or AGL to a floor, or visualize a three dimensional point in space. Additionally, the information they receive from wireless carriers should enable the 9-1-1 center to do better for law enforcement, fire, and EMS counterparts in the field; rather than just providing a height estimate that we then would try to match with our own devices. In order for 9-1-1 professionals to have the information they need to ensure that responders arrive as quickly as possible, they at least need a floor number estimate (e.g. "4th floor" rather than "12 meters AMSL"). Accordingly, as you contemplate rules for a z-axis metric, please consider requiring wireless carriers to provide a floor number as part of the z-axis information. Requiring wireless carriers to provide actionable location information about 9-1-1 callers will save lives.

Thank you for taking my views into consideration.

Andy H. Hwang
Chief of Police
Federal Way Police Department

No. of Copies rec'd _____
List ABOVE 1