



November 6, 2019

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

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

The International Association of Chiefs of Police (IACP) is an interested party in the above-referenced rulemaking proceeding and pursuant to Section 1.1206 of the FCC's rules submits this written ex parte submission.

The IACP is the world's largest and most influential professional association for police leaders. With more than 31,000 members in over 160 countries, the IACP is a recognized leader in global policing, committed to advancing safer communities through thoughtful, progressive police leadership. Since 1893, the association has been serving communities worldwide by speaking out on behalf of law enforcement and advancing leadership and professionalism in policing worldwide. The IACP is known for its commitment to enhancing community safety by shaping the future of the police profession.

The IACP commends your leadership and the Federal Communications Commission (FCC) for its focus on improving the location information being provided to first responders from wireless devices during 9-1-1 calls. Improved horizontal location information, with the addition of the new 3 meter vertical location metric will allow our members and the law enforcement human resources we manage to provide lifesaving assistance in the most time-effective manner. We strongly support the Commission's draft Z-axis Report & Order and Further Notice of Proposed Rulemaking and urge its adoption as written.

The IACP has written to many of your predecessors urging action in this area, specifically asking the Commission to consider regulations that require telecommunications providers to provide indoor cellular location data to law enforcement, just like caller data provided for wired phones and noting the importance of capturing location data for all call types regardless of the user device location.

**President**  
Chief Steven R. Casstevens  
*Buffalo Grove, IL, Police Department*

**Immediate Past President**  
Chief Paul M. Cell  
*Montclair State University, NJ, Police Department*

**First Vice President**  
Chief Cynthia E. Renaud  
*Santa Monica, CA, Police Department*

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*Vail, CO, Police Department*

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*Arlington, TX, Police Department*

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*Aurora, IL, Police Department*

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*U.S. Department of Homeland Security Washington, D.C.*

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**General Chair, Midsize Agencies Division**  
Chief Sandra Spagnoli  
*Beverly Hills, CA, Police Department*

**Parliamentarian**  
Chief Russell B. Laine (retired)  
*Algonquin, IL, Police Department*

**Executive Director / Chief Executive Officer**  
Vincent Talucci, CAE  
*Alexandria, VA*

**Deputy Executive Director / Chief Operating Officer**  
Terrence M. Cunningham  
*Alexandria, VA*

Ensuring the highest level of public safety is of utmost importance and an obligation we share with you and policymakers at every level. It is a responsibility that requires keeping pace with technological advances and adapting to the fact that 9-1-1 calls are increasingly made from wireless phones inside of multi-level buildings. The lack of vertical location data for indoor cellular callers has been a gap in public safety that the draft order addresses.

Indoor location accuracy technology enables improved situational awareness, which in turn enables improved personal protection for law enforcement officers and enhanced homeland security for the general public we are sworn to protect.

We urge you and your colleagues to move forward, without delay, in implementing the draft report and order and enabling this improvement to indoor location accuracy standards. With your help, we can ensure that no more lives are lost due simply to the inability to locate an individual in need.

Sincerely,

A handwritten signature in black ink, reading "Steven R. Casstevens". The signature is fluid and cursive, with a large, sweeping "S" at the beginning and a long, horizontal stroke at the end.

Chief Steven R. Casstevens  
President, IACP

cc:

Honorable Michael O'Rielly, Commissioner  
Honorable Brendan Carr, Commissioner  
Honorable Jessica Rosenworcel, Commissioner  
Honorable Geoffrey Starks, Commissioner