



INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS®

HAROLD A. SCHAITBERGER
General President

EDWARD A. KELLY
General Secretary-Treasurer

November 7, 2019

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

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

Dear Ms. Dortch,

On November 7, 2019, International Association of Fire Fighters (IAFF) staff Shannon Meissner, Director of Governmental Affairs, and Dave Lang, Assistant to the General President, met with Austin Bonner, Legal Advisor to Commissioner Starks, to discuss 911 location accuracy.

During our meeting, we expressed support for the Fifth Report and Order and establishing a +/- 3 meter z-axis metric. We reiterated comments made in previous IAFF filings that establishing such a metric would better protect the public as well as emergency responders, and that tests conducted in multi-story buildings with and without three-meter altitude information demonstrate dramatically decreased response times.

We noted that three meter accuracy provides fire fighters a sufficient metric for a response, as standard fire fighting operations require responders to conduct search operations and address potential fire extension one floor above and one floor below any working fire. Even with precise floor level information, fire fighters in a multi-story building would operate over three floors.

In response to questions relating to accurate transmission of z-axis data to emergency responders, we noted that 911 professionals and fire fighters already conduct education and training to ensure the proper communication of location information. Evolving technology over the past twenty years has caused 911 telecommunicators and responders to adjust to new standards, terminology and technology. We expressed our commitment to working with the entire emergency response community to ensure all responders and professionals involved in the 911 emergency response system receive proper education and training on communicating z-axis data.

We also expressed support for the Commission's Fifth Further Notice of Proposed Rulemaking and potentially tightening the z-axis metric over time as technology evolves.

Finally, we reiterated concerns that dispatchable location technology is not currently feasible, as tests indicate that even minimum levels of dispatchable location performance are not currently achievable.

Thank you for your attention to this matter. Please do not hesitate to contact me directly if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Shannon A. Meissner', with a stylized, cursive script.

Shannon A. Meissner

Director, Governmental Affairs

International Association of Fire Fighters