



Leaders in Public Safety Communications®

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

On November 7, the undersigned met with Commissioner Carr to discuss wireless 9-1-1 location accuracy. APCO cannot support the z-axis Order without significant changes to the draft. The draft Order does not achieve the Commission's intent that z-axis information will serve as a backstop for identifying a 9-1-1 caller's floor level in the event that a dispatchable location is not provided.¹ The draft Order does not even ensure that first responders will know a caller's vertical position within 3 meters for 80% of calls, as the metric seemingly requires.

The Commission's 2015 Order set a three-year timeline for a z-axis metric for testing "to determine the appropriate accuracy benchmark."² The Commission should not treat the establishment of a z-axis metric as an opportunity to abandon the pursuit of dispatchable location solutions in lieu of an x/y/z approach, but that will be the effect without significant changes to the draft Order. Moreover, by adopting the draft Order, the Commission will leave 9-1-1 location worse off than the Commission's 2014 proposal to require x/y within 50 meters and z within 3 meters because that proposal 1) would have required z-axis information within 3 meters for calls nationwide rather than being limited to the top 50 CMAs, 2) would likely have applied by 2020, and 3) would have based carriers' compliance on delivery of z-axis information to 9-1-1 rather than basing compliance on carriers' deployment of z-axis technology. The z-axis metric will define the accuracy and nature of information that will be used to identify the vertical location of the caller. The Commission should, therefore, be open to establishing a z-axis metric that is based on the ability of technology to identify a floor level.

Absent a more comprehensive approach to the z-axis metric and the location accuracy rules, carriers could comply with the rules without ensuring that

¹ See Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, Fourth Report and Order, 30 FCC Rcd 1259, para. 162 (2015) (explaining that "by providing a z-axis metric as a backstop to dispatchable location for identifying floor level of 911 calls from multi-story buildings, we ensure that vertical location accuracy is achieved.").

² *Id.* at para. 113.

public safety professionals receive actionable information. At a minimum, the Commission's Order should require that an estimated floor level be included as part of the z-axis information provided to emergency communications centers and ensure that the accuracy requirements defined in the metric translate to real-world performance. As APCO has repeatedly stated, the carriers have a number of technology options available today to provide a floor number, if not a dispatchable location.

The Commission has an opportunity to adopt a z-axis metric that sets a path for providing what's needed for public safety professionals and the public they serve. Requiring z-axis information to include an estimated floor is an essential step that aligns with bigger-picture changes to the rules that are needed for getting carriers back on track to providing meaningful improvements to 9-1-1 location accuracy.³

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically with your office.

Respectfully submitted,

APCO INTERNATIONAL

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³ On October 25, APCO submitted a comprehensive framework for a z-axis order and accompanying further notice of proposed rulemaking. *See* Letter from Jeffrey S. Cohen, APCO International, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket No. 07-114 (filed Oct. 25, 2019).