



## POLICE DEPARTMENT

NYPD Communications Division  
350 Marconi Street  
Bronx, NY 10461

November 12, 2019

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

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

Dear Ms. Dortch:

I am a Deputy Chief in the New York City Police Department and the Commanding Officer of the Communications Division. I oversee New York City's 911 operators and radio dispatchers. I write to voice my support for APCO's position that the FCC's draft z-axis order must be changed to ensure that 9-1-1 professionals receive actionable location information when our citizens place an emergency call from inside buildings. This would best assist us with carrying out our mission to protect and save lives.

My agency is the largest center in the country and processed 8.9 million 9-1-1 calls last year, with approximately 69% YTD originating from cell phones. We handle all emergency calls for the five boroughs of New York City (NYC). The population speaks several hundred languages, making NYC the most linguistically diverse city in the world.

The location information must be actionable, meaning that Police Communications Technicians (PCTs - 911 operators and dispatchers) 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 ellipsoid" (HAE). Our 911 center does not have the equipment (a 3D map) to translate the z-coordinates that the cell phone carriers would provide to retrieve the information that is needed. 9-1-1 centers like mine do not have the resources to create and maintain indoor maps for thousands of buildings in our jurisdictions, nor should we be expected to do so. Even if we did, we would not have the ability to translate HAE to a floor, or visualize a three dimensional point in space.

I would also caution against an assumption that our law enforcement would have devices capable of measuring altitude as HAE, and will easily be able to match their measurements to what's received from the 9-1-1 caller. This will be especially difficult and even unsafe during emergencies such as a building fire or active shooter incident for first responders to try to identify the location on their device.

In order for 9-1-1 professionals to have the information they need to ensure that responders arrive as quickly as possible, carriers should at least provide a floor number estimate (e.g.. "4<sup>th</sup> floor," rather than only providing "76 meters HAE, +/- 3 meters"). Accordingly, as you contemplate rules for a z-axis metric, I urge you to 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, using any and all available technologies, will save lives.

Thank you for taking my views into consideration.



Richard Napolitano  
Commanding Officer,  
NYPD Communications Division