



November 13, 2019

VIA ELECTRONIC FILING

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

Re: Ex Parte Presentation, Wireless 9-1-1 Location Accuracy, PS Docket No. 07-114; GN Docket No. 17-183; ET Docket No. 13-49; and PS Docket No. 13-42

Dear Ms. Dortch,

On Friday, November 8, 2019 Brandon W. Allen (myself), Government Relations Manager for the International Association of Fire Chiefs (IAFC) met separately with Commissioner Starks' Legal Advisor, Austin Bonner, and Commissioner Rosenworcel's Chief of Staff, Travis Litman to discuss the FCC's draft *Fifth Report and Order and Fifth Further Notice of Proposed Rulemaking*.¹ A representative from the International Association of Fire Fighters (IAFF), Greg Russell, was present at the latter meeting. On Wednesday, November 13, 2019, Brandon W. Allen met with Commissioner O'Rielly's Legal Advisor, Erin McGrath.

During the meetings, the IAFC and IAFF expressed our members' support for the *Draft Fifth Report and Order*, which meets the needs of the emergency response community.² We reiterated our belief that z-axis data is actionable. Unlike x/y data, which must be translated from lengthy coordinates to an approximate street address, Height Above Ellipsoid (HAE) altitude data is transmitted in digestible numbers, extending no more than two decimal points. While technologies exist that allow an Emergency Communications Center to translate vertical data from HAE to Height Above Ground Level, emergency responders can act upon the data when it is delivered in either format by simply matching altitude information on their own equipment using an HAE-capable application, device or dedicated wearable display.

¹ Wireless E911 Location Accuracy Requirements, Draft Fifth Report and Order and Fifth Further Notice of Proposed Rulemaking, PS Docket No. 07-114 (rel. Oct. 29, 2019), <https://docs.fcc.gov/public/attachments/DOC-360516A1.pdf>.

² See Press Release IAFC, IAFF Applaud FCC Order on Wireless 911 Calls (rel. November 6, 2019) ("The International Association of Fire Chiefs, International Association of Fire Fighters, International Association of Chiefs of Police, National Sheriffs' Association and National Association of State EMS Officials support the Fifth Report and Order and Further Notice of Proposed Rulemaking..."), <https://www.iafc.org/press-releases/press-release/iafc-applauds-fcc-order-on-wireless-9-1-1-calls>.

Fire departments can use vertical location tools to pre-plan buildings in their districts or pinpoint the location of a firefighter that has signaled mayday in a multi-story building. The *Draft Fifth Report and Order* will encourage the market to develop technologies that will put vertical location data in the first responder's hands, making the responder and American citizen safer.

We do not find the argument that emergency responders should wait for alternate technologies to reliably provide a floor-level estimate convincing, particularly if alternate approaches seek to identify only a grouping of floors³ or are prone to misidentification of the caller's address.⁴ New technology solutions may indeed help us achieve greater accuracy in the future, but it is critical that the FCC adopt a +/- 3 meter z-axis metric for wireless 911 calls now. We look forward to supporting a continued narrowing of the z-axis and evaluating dispatchable location solutions in the *Fifth Further Notice of Proposed Rulemaking*.

In addition to raising these points in our meetings, the IAFC spoke with Commissioner Starks' staff about our positions in other proceedings before the FCC that are of concern the fire and emergency service. These include the T-Band, 4.9 GHz, 5.9 GHz, and 6 GHz proceedings. The arguments expressed during the conversation were consistent with our comments in the record.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS and provided to the meeting attendees.

Sincerely,

/s/ Brandon W. Allen

Brandon W. Allen
Manager, Government Relations

³ See Letter from Megan Anne Stull, Counsel to Google LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket 07-114 (Nov. 8, 2019) (urging the Commission to permit the provision of floor label data within a range of one floor above or below the location of the wireless callers to E911).

⁴ Comments of NENA: the 9-1-1 Association, PS Docket No 07-114, at 1 (May 20, 2019) (expressing concern about the substantial risks that would result from attempting to convert a numeric altitude reading into a potentially incorrect address or floor level value, observing that "[i]f that address is in any way incorrect, then it is potentially much more harmful than a geodetic location that has a low degree of precision").