November 13, 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 the Executive Director of the Tarrant County 9-1-1 District. I am voicing my support for the position taken by APCO in regards to the FCC’s draft z-axis order. The data received by the carriers must be actionable ensuring that citizens who place a call in a building can be found without delay. I write to provide an operational perspective on the type of location information needed by 9-1-1 professionals to best carry out our mission to protect and save lives.

The agencies in our County process nearly 2 million 9-1-1 calls per year, with approximately 84% originating from cell phones. As the second largest 9-1-1 authority in the state of Texas we strive to provide emergency services in the most expeditious manner possible. An accurate location is of utmost importance in this endeavor.

Vertical location information for 9-1-1 callers from inside buildings could improve emergency response. The location information must be actionable, meaning that Public Safety Telecommunicators (PSTs) 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 a floor number.

A raw vertical estimate is of little operational value if it is relative to height above mean sea level (AMSL) or above ground level (AGL). Emergency Communication Centers like ours simply do not have the resources to create and maintain indoor maps for buildings in our jurisdictions. Additionally, we do not have the ability to translate AMSL or AGL to a floor, or visualize a three dimensional point in space. Taking into consideration that seconds count when saving lives even if we were to train PST’s to “do the math” it would consume more time that should be used to provide the emergency assistance expected. The information we receive from wireless carriers should enable us to improve response times with accurate location information for our law enforcement, fire, and EMS counterparts in the field instead of providing a height estimate that they then would try to match with their own devices.

In order for 9-1-1 professionals to have the information they need to ensure that responders arrive as quickly as possible, they at least need a floor number estimate (e.g.. “4th floor” rather than “12 meters AMSL” or “76 meters height above ellipsoid (HAE), +/- 3meters). Accordingly, as you contemplate rules for a z-axis metric, please 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 will save time which in turn will save lives.

Thank you for taking my views into consideration.

Shinar Haynes

Executive Director

Tarrant County 9-1-1 District