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October 31, 2014

The Honorable Tom Wheeler  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: Docket No. 07-114, Wireless E911 Location Accuracy Requirements

Dear Chairman Wheeler,

On behalf of our nation's frontline fire fighters and emergency medical personnel, we are writing to reaffirm our strong support for the Commission's proposed rules to improve wireless location accuracy and proceed quickly with their adoption.

As noted in previous comments, the proposed rules vastly improve the ability of first responders to locate indoor calls. We are particularly supportive of incorporating vertical accuracy requirements. While particularly helpful in urban areas with a significant number of multistory buildings, such requirements will reduce response time in any community with multistory structures. We agree with our partners in law enforcement, the International Association of Chiefs of Police and the National Sheriffs' Association, that "...any indoor location accuracy technology must include vertical location of near floor level accuracy to provide useful information for first responders."

Reduced response times are not only significant for patient outcomes, they also improve the safety of responding personnel. Directed searches reduce stress and disorientation of responders, whereas multistory searches are physically taxing and, in the case of a fire or other hazardous environment, may exceed the remaining time provided by a fire fighter's breathing apparatus.

The proposed fifty meter horizontal accuracy and three meter vertical accuracy (also known as the x, y, and z axis) requirements clearly have value for public safety as well as responder safety. We believe that specification of location accuracy metrics is essential for both the vertical and horizontal axes. The undersigned groups representing the fire and emergency

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medical services want the Commission to fully understand that including x, y and z axes in its final rules is essential to achieving successful responses to incidents. Industry continues to make noteworthy progress in improving location accuracy and additional improvements in technology will occur with a strong regulatory underpinning. Therefore, the undersigned organizations ask the Commission to resist any attempts to reduce or delay the proposed accuracy levels.

As the Commission is acutely aware, consumers continue to transition from landline phones to cell phones; nearly eighty percent of 911 callers use a wireless phone to report emergencies, and more than one-third of households in the United States are already wireless-only. For such households in particular, the proposed rules could literally prove the difference between life and death.

Thank you for your attention to this critical public safety matter and your continued commitment to the communications needs of our nation's frontline emergency responders.

Sincerely,

Congressional Fire Services Institute  
International Association of Fire Fighters  
National Volunteer Fire Council