

**International Association of Chiefs of Police
International Association of Fire Chiefs
National Association of State Emergency Medical Services Officials
National Sheriffs' Association**

November 14, 2014

The Honorable Thomas Wheeler, Chairman
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

Re: PS Docket No. 07-114, Wireless Location Accuracy Requirements

Dear Chairman Wheeler:

The International Association of Chiefs of Police (IACP), the International Association of Fire Chiefs (IAFC), the National Association of State Emergency Medical Services Officials (NASEMSO), and the National Sheriffs' Association (NSA) together file this letter in addressing the Federal Communications Commission's (FCC) proposal to update its wireless indoor location accuracy rules. The IACP is a worldwide organization of more than 22,000 members that serves as the professional voice of law enforcement. The IAFC represents almost 10,000 leaders of the nation's fire and emergency service. NASEMSO represents executive, medical, operational, regulatory, and other directors of statewide EMS systems in all 56 states and territories. The NSA represents the 3,080 sheriffs of the United States and advocates for policies that will improve the quality of service to their constituents. Our organizations commend the FCC for its focus on improving the location information being provided to first responders from wireless devices during 9-1-1 calls. More accurate location information allows our members to provide lifesaving assistance in the most time-effective manner.

We are aware that there have been ongoing negotiations among the wireless carriers, the Association of Public-Safety Communications Officials International (APCO), the National Emergency Number Association (NENA), and the CTIA-The Wireless Association to develop an alternative to the proposed FCC regulations for 9-1-1 location information. We were not consulted on these negotiations and were not provided any details of the discussions until October 29, 2014. Our organizations are disappointed that we were not consulted earlier, because we represent the leadership of the frontline first responders who are called upon to respond to 9-1-1 emergencies every day. Since October 29, we have been actively engaged in discussions with the carriers and other organizations to ensure that any voluntary consensus agreement will provide the most accurate location information during 9-1-1 calls.

The proposed roadmap agreement that was provided to us on November 13 would develop an alternative timeline to the FCC's proposal. The agreement is focused on developing a "dispatchable location" that can be transmitted to a public safety answering point (PSAP), when a victim dials 9-1-1 on a wireless device. The term "dispatchable location" is defined as "the civic address of the calling party, which includes floor, suite, apartment or other information when needed to adequately identify the location of a calling party" (October 31 version of the proposed roadmap). This definition of a "dispatchable location" would provide first responders with the information that they require to efficiently respond to a 9-1-1 call and provide the necessary lifesaving service.

However, even though we support the definition of dispatchable location as defined by the earlier roadmap draft agreement proposed by CTIA and the carriers, we have serious concerns about the details of the actual roadmap. For example, we believe that the carriers should utilize all potential

technology options in determining the dispatchable location of a 9-1-1 caller using a wireless device, including technology using both compensated and uncompensated barometric pressure. The proposed roadmap relies on technology solutions for 9-1-1 emergencies that have never been tested in a real-world environment, including the use of in-building Wi-Fi and Bluetooth information and crowdsourcing. We urge the FCC to ensure that the carriers also use technologies that have been tested by the Communications Security, Reliability and Interoperability Council (CSRIC) in their efforts to meet requirements for providing dispatchable location.

We also have concerns that many of the provisions in the roadmap must be worked out after the agreement has been finalized. For example, the roadmap depends on technology that has never been tested. It is disconcerting that the burden for providing lifesaving call information is relying on untested technology solutions. Also, we are concerned that many of the details of the proposed National Emergency Address Database (NEAD) remain undetermined. The NEAD is key to the proposal to provide dispatchable location by using Wi-Fi and Bluetooth information. Yet the governance and funding of the NEAD is unresolved.

We believe a better approach is for the FCC to focus on using performance-based metrics for providing dispatchable location to PSAPs. This approach would be technology-neutral and the specific metrics would be enforced by the FCC. Attached is our proposal for setting these enforceable metrics for the carriers to provide dispatchable location to local PSAPs.

Our organizations to date have supported the FCC's proposed regulations. At the same time, we are not opposed to a voluntary consensus agreement that has achievable benchmarks and is enforceable by the FCC to ensure that the carriers provide improved indoor location results in a reasonable timeframe. It is critical, however, that benchmarks and goals address verifiable results experienced by PSAPS in the field or through representative test beds. This approach must ensure that the carriers utilize all potential forms of technology to provide this information and not rule out any form of technology in the beginning. We believe that the carriers must bear the ultimate responsibility for ensuring accurate indoor location technology across the country.

Thank you for attention to this important issue.

Respectfully,

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