

David Furth

From: Claude Stout - TDI Executive Director <cstout@tdiforaccess.org>
Sent: Friday, November 14, 2014 1:52 PM
To: Brian Fontes
Cc: Claude Stout; Tom Wheeler; Mignon Clyburn; Jessica Rosenworcel; Ajit Pai; Mike O'Rielly; Daniel Alvarez; Maria Kirby; Louis Peraertz; David Goldman; Priscilla Argeris; Brendan Carr; Erin McGrath; David Simpson; David Furth; Kris Monteith; Karen Peltz Strauss; Gregory Hlibok; Conlon-Mentkowski, Sheila@DOR; Stephanie Buell; Rebecca Rosenthal
Subject: TDI encourages NENA to reconsider its position on the proposed wireless indoor location accuracy agreement with APCO, and the other four wireless carriers
Attachments: Comparison of FCC vs Carrier Proposals_final.pdf

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Hi Brian,

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Federal Communications Commission
Office of the Secretary

I don't often send you an urgent email, but today I feel compelled to do so. Over the years, you have been someone I have come to appreciate working, and doing business with. I still do believe we can count on you.

Here attached is the comparison sheet of the FCC's proposed rules versus what we learned are likely to be part of the consensus agreement. Please know we have expressed our opposition, for clearly two reasons: 1.) we were not invited to the negotiating table, which by itself is a serious affront to us, and 2.) we do not approve of the details that are in the consensus agreement.

The comparison sheet clearly shows that the FCC's proposed rules favor consumers. The objective of this process has been to protect the lives, and personal safety of consumers, those with or without disabilities. As you well know, the issues are a bit more challenging for us consumers with disabilities, due to communication and limits of technology.

I would encourage that you and I meet face-to-face very soon, and discuss more about the consensus agreement. Please refrain from having NENA sign on with its approval to the agreement until we meet ourselves early this coming week.

Thank you for your consideration. This is not about our jobs nor either of our Associations' future. It is about the best America can do for our constituents' emergency needs, either man-made, natural, of some criminal nature, etc. Unequivocally, they must be our ultimate goal.

You are most welcome to share this email with your Board of Directors. They need to consider all factors before they vote on this topic. I am copying this email to the five-member Commission, and bureau chiefs and deputy chiefs of both the Public Safety and Homeland Security Bureau and the Consumer and Governmental Affairs Bureau, FCC.

Sincerely,
Claude Stout
Executive Director
Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)

Comparison of FCC's Proposed Rule vs. Carrier Proposal

	FCC's Proposed Rule	Carrier Proposal
Horizontal Accuracy Requirement	50 meters	None
Vertical Accuracy Requirement	3 meters	None
Deadline for Horizontal Accuracy Implementation	2 years for 67% of calls, 5 years for 80% of calls	None
Deadline for Vertical Accuracy Implementation	3 years for 67% of calls, 5 years for 80% of calls	None
Proposed approach	Mandatory location accuracy requirements and timetable	Entirely new and untested system with no set accuracy requirements
Coverage of approach	All handsets	New 4G handsets with special chipset only
Requirement to Share "Dispatchable Addresses" for Wireless 911 Calls	No requirement, but dispatchable addresses meet accuracy requirements of rule	No specific requirements for dispatchable addresses, only long-term use of vague "heightened accuracy technologies" with no quantitative requirements.
Availability of technology	Tested and independently verified technology available	Significant technological development, testing and verification needed for new database system, beacon-based approach
Use of emerging/alternate technologies to meet obligations	Encouraged under technology-neutral approach	No consideration of alternate technologies for 36 months, then sets an arbitrary 50% threshold for accuracy improvement
Two year impact	Specific horizontal accuracy requirements in effect for 67% of calls	Technology capability to be "demonstrated," no specific requirements for accuracy for any calls
Four/five year impact	Specific vertical and horizontal accuracy requirements in effect for 80% of calls (after five years)	No specific accuracy requirements; "heightened accuracy technologies" in use for 80% of calls (after four years)
National security implications	None	Proposes use of Russian-owned GLONASS satellite system as key element