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December 10, 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

VIA ELECTRONIC FILING

Re: In The Matter Of Wireless E911 Location Accuracy Requirements, Third Further Notice Of Proposed Rulemaking, P.S. Docket No. 07-114

Dear Ms. Dortch:

The Industry Council for Emergency Response Technologies (“iCERT” or “Industry Council”)ⁱ respectfully submits the following comments in response to a Public Notice (“Notice”) released by the Federal Communications Commission (“FCC” or “Commission”), Public Safety and Homeland Security Bureau (“Bureau”), on November 20, 2014.ⁱⁱ In this Notice, the Bureau seeks comment on the “Roadmap for Improving E911 Location Accuracy” (“Roadmap”) submitted by the Association of Public-Safety Communications Officials International (“APCO”), the National Emergency Number Association (“NENA”), AT&T Mobility, Sprint, T-Mobile USA, and Verizon (collectively “the Parties”). The Roadmap was developed and filed with the Commission in response to the Third Notice of Proposed Rulemaking (“Third NPRM”) in this proceeding, in which the Commission proposed ambitious rules for improving location accuracy for 911 calls originating indoors, while also “encourag(ing) industry, public safety entities, and other stakeholders to work collaboratively to develop alternative proposals.” The Industry Council applauds the Parties for meeting the Commission’s challenge. We also commend the Commission for providing stakeholders the opportunity to comment on this agreement, and thus, provide the constructive feedback necessary to make the Roadmap viable and inclusive.

The Industry Council supports the FCC’s commitment to improve the accuracy of location information, regardless of whether a call originates indoors or outdoors. In its Reply Comments to the Third NPRM, iCERT urged the Commission to consider voluntary arrangements, such as the one currently under consideration, as a more appropriate and expedient means to achieve this critical goal. iCERT laid out several important objectives that it believes should guide any such agreement.ⁱⁱⁱ

Principle among these objectives is the development and implementation of solutions that provide first responders with meaningful and actionable location information that includes the delivery of a dispatchable address (or dispatchable location). The Third NPRM clearly stated that the Commission's long-term indoor location objective is "the delivery of 'dispatchable address' information, including the caller's building address, floor level, and suite/room number,"^{iv} and the public safety community identifies a dispatchable address as the "gold standard" for 911 location accuracy.^v The Roadmap is a significant development in this proceeding, as it demonstrates that the provision of dispatchable location information is achievable in the relative near term. It achieves this objective by focusing on the use of indoor technologies to solve the indoor location challenge. By leveraging commercial technologies like Wi-Fi[®] and Bluetooth[®] Low Energy beacons that are already widely deployed and used for commercial location-based services, the Roadmap will facilitate the delivery of accurate location information for indoor calls in a timeframe that is aligned with the Commission's proposed rules but with the additional benefit of providing first responders with a dispatchable address.

Importantly, the Roadmap is not limited to utilizing Wi-Fi and Bluetooth technologies, even for the delivery of a dispatchable address. It appropriately recognizes that other indoor technologies might also be used to provide a dispatchable address or location, and iCERT urges the Commission to ensure that any policy framework it establishes in this proceeding is technology neutral.

iCERT believes that the Roadmap is an excellent plan for guiding further efforts, but recognizes that there is much work to do to enable fully functional dispatchable location solutions. In particular, the creation of the proposed National Emergency Address Database is a critical component of achieving the Roadmap's vision. iCERT recommends focusing increased attention on making that database a reality as quickly as possible.

Importantly, while promoting the development of dispatchable address solutions, the Roadmap does not abandon efforts to continue improving location solutions based on latitude/longitude. In fact, the Roadmap identifies concrete initiatives that will be undertaken to promote improved location accuracy using such technologies. This includes near-term initiatives to improve location accuracy for both outdoor and indoor calls while dispatchable location solutions are being developed, as well as longer term initiatives that will be implemented if dispatchable location solutions do not develop as expected.

Further, the Industry Council commends the first responder community for their forthright comments, through considered statements offered by their national associations, on the need for the deployment of even more technological solutions in pursuit of the end goal of a dispatchable location, and for their ongoing support of a collaborative process in reaching the FCC's goals. It is the Industry Council's opinion that a comprehensive solution must be derived from the experienced input of each community across the call-taking, dispatching and emergency service response continuum.

While the Roadmap identifies various explicit initiatives that the carriers will undertake to improve location accuracy for both outdoor and indoor 911 calls, it also includes clear and enforceable metrics that wireless service providers must satisfy regardless of whether or not these particular initiatives or the specific technologies identified for use prove fruitful. Combined with the provisions associated with the development of an open, transparent, and competitively neutral test bed, the Roadmap provides a technology neutral framework that ensures that all technically feasible and commercially viable technologies will be considered.

Finally, while iCERT favors a collaborative, market-based approach, the establishment of such a framework cannot take precedence over the need to provide first responders with timely and accurate location information for all 911 calls including calls made from indoor locations. Significantly, the Roadmap does not rely solely on a voluntary agreement among the Parties. Rather, it asks the Commission to codify into its rules certain provisions of the Roadmap in order to provide greater assurance to the Commission and to the public safety community that the objectives of the Roadmap will be met. This includes aggressive metrics that will ensure accurate location

information is provided to PSAPs, whether in the form of a dispatchable address or a location based on latitude/longitude information that is commensurate with the Commission's proposal (i.e., 50 meters).

iCERT believes that the Roadmap provides an effective framework to guide the improvement of 911 location accuracy into the future. Most importantly, it includes the establishment of new and important performance standards for indoor 911 calls – an issue of critical importance to public safety and to everyone who counts on emergency services. Moreover, by focusing on public safety's ultimate goal of providing a dispatchable address and leveraging indoor technologies that are widely deployed, the Roadmap will provide first responders with location solutions that are more effective and available sooner.

iCERT commends the Commission for continuing its efforts to advance reliable emergency communications for the American public and urges it to give full consideration to the Roadmap as it concludes its deliberations in this proceeding.

Respectfully submitted,



George Rice
Executive Director

ⁱ Established by a group of prominent business leaders in December, 2005 originally as the 9-1-1 Industry Alliance, iCERT plays an important role as the voice of commercial public safety companies, wireless carriers, and related vendors on public policy issues impacting 9-1-1 and the emergency response system. iCERT's membership is diverse, and many of its members not only have differing business objectives, they may be direct competitors. All of iCERT's members agree that an invigorated vendor community engaged in frequent two-way dialog with public safety officials, regulators and policy makers is indispensable to creating the highest quality emergency services for all Americans. Industry Council members believe history has demonstrated that business leaders' expertise can assist public policy makers and government emergency communications professionals as they address complex choices regarding advanced communications technologies. *See*, <http://www.theindustrycouncil.org/index.cfm>

ⁱⁱ "Public Safety and Homeland Security Bureau Seeks Comment in the E911 Location Accuracy Proceeding on the Location Accuracy 'Roadmap' Submitted by APCO, NENA, and the Four National Wireless Carriers," Public Notice, PS Docket No. 07-114, released Nov. 20, 2014.

ⁱⁱⁱ iCERT Reply Comments, p. 4.

^{iv} FNPRM, paragraph 50.

^v Comments of the National Emergency Number Association, p. 18.