

**National Association of Emergency Medical Services Physicians
National Association of Emergency Medical Technicians
National Association of State Emergency Medical Services Officials
National Emergency Medical Services Management Association**

December 15, 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 National Association of EMS Physicians (“NAEMSP”), the National Association of EMTs (“NAEMT”), the National Association of State EMS Officials (“NASEMSO”) and the National EMS Management Association (“NEMSMA”) are jointly herein referred to as the “Associations.” The Associations file this letter in response to the November 20th public notice issued by the Public Safety and Homeland Security Bureau (Bureau) seeking comment on the “Roadmap for Improving E911 Location Accuracy” (Roadmap). The Roadmap was filed in the E911 Location Accuracy proceeding by the Association of Public-Safety Communications Officials (APCO), the National Emergency Number Association (NENA), AT&T Mobility, Sprint, T-Mobile USA, and Verizon (Carriers).¹

NAEMSP, with a membership of over 1,500, represents emergency physicians who specialize in EMS leadership and practice at the local and state levels.

NAEMT represent America’s front-line medical professionals, numbering some 32,000 members who are responsible for bringing state of the art medical assistance to those in need, wherever they are.

NASEMSO represents the government officials charged with coordinating the EMS systems in the 56 states and territories, and with licensing personnel and agencies in those jurisdictions. These include state EMS directors, physician medical directors, and others specializing in the various components which make the systems work.

NEMSMA is the association of EMS chiefs and other officials who lead paramedic services on a day-to-day basis. Its members, their staffs, and the public who seeks their emergency assistance, are the most immediately impacted by the ability of 9-1-1 to accurately locate callers.

Despite the crucial role of EMS in public safety emergency response, none of our Associations were invited to participate in the negotiations that led to the Roadmap agreement by APCO, NENA and the Carriers.

The national, organized leadership of frontline first responders are united in speaking against the Roadmap agreement. One of our Associations, NASEMSO, joined with the International Association of Chiefs of Police, the International Association of Fire Chiefs, and the National Sheriff’s Association in filing a letter to you against the agreement. We note that the Congressional Fire Services Institute,

¹ Wireless E9-1-1 Location Accuracy Requirements, PS Docket No. 07-114, Third Further Notice of Proposed Rulemaking, FCC 14-13 (Feb. 20, 2014) (“*FNPRM*”).

the International Association of Firefighters, the National Volunteer Fire Council and the Metropolitan Fire Chiefs Association² all object to the Roadmap. Our Associations join these other efforts to urge the FCC to not accept the Roadmap as written.

The Roadmap is focused on developing a “dispatchable location” that can be transmitted to a public safety answering point (PSAP), when a caller dials 9-1-1 on a wireless device. Even though we support the definition of dispatchable location as defined in the Roadmap, 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, Bluetooth information and crowdsourcing.

The Roadmap is replete with provisions centered on upgrades in the carriers’ network. We note that the final Roadmap includes language in section 1a that they will test technologies such as Wi-Fi, Bluetooth, femtocells and similar technologies that are already being used in the enterprise setting. It appears to us that most of the Roadmap is focused on the use of indoor location tools that are untested and may not be the panacea that the carriers believe them to be. Also, a consultant to CTIA indicated that their use as a location accuracy presumes the ubiquitous deployment of these technologies and that use or placement of them are outside the control of the Carriers.³ Even if they do prove to be usable, it is hard to believe that these technologies will be deployed in all buildings and homes.

As to advanced vertical (z-axis) technology, the only commitment is to address the issue of using uncompensated and compensated barometric pressure within 36 months, if the PSAPs and carriers determine such data to be beneficial to public safety. Also, the Roadmap limits any use of the technology unless there are two proven candidate technologies. This is totally unacceptable and virtually eliminates any substantive effort on vertical technology use.

The Roadmap depends heavily on technology that has never been tested. It is disconcerting that the burden for providing lifesaving call information may rely on such untested technology solutions. Governance and funding of test beds and the National Emergency Address Database is unresolved. Any funding shortfalls must be borne by the Carriers.

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 enforceable by the FCC.

Our Associations have supported the FCC’s original proposed regulations on location accuracy. At the same time, we are not opposed to the FCC incorporating portions of the Roadmap into its final rules so long as they are measureable and achievable benchmarks which are 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 due to any potential costs.

We believe that the carriers must bear the ultimate responsibility for ensuring accurate indoor location technology across the country.

² Joint comments of CFSI, IAFF, and NVFC of October 31, 2014; Metro Chiefs reply comments of July 14, 2014.

³ Attachment to CTIA reply comments of July 14, 2014.

Thank you for attention to this important issue.

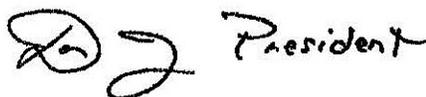
Respectfully,



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