

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In The Matter Of )  
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Wireless E911 Location Accuracy Requirements ) PS Docket No. 07-114  
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**COMMENTS OF INTRADO**

Intrado Inc. and Intrado Communications Inc. (together, “Intrado”) respectfully submit the following comments in connection with Public Notice DA 14-1680 released November 20, 2014 by the Federal Communications Commission (“FCC” or “Commission”).<sup>1</sup>

Intrado commends the Commission for encouraging voluntary industry solutions that would make the wireless user community and the general public safer through improvements to location accuracy.<sup>2</sup> The recently released “Roadmap”<sup>3</sup> is the direct result of the Commission’s request that stakeholders work on a consensus approach to improving wireless location accuracy.<sup>4</sup>

The Roadmap holds the promise of facilitating what stakeholders, as well as the Commission, agree is the best result for public safety: “. . . the delivery of a dispatchable

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<sup>1</sup> P.S. Docket No. 07-114, 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, Released November 20, 2014.

<sup>2</sup> Wireless E911 Location Accuracy Requirements, Third Further Notice of Proposed Rulemaking, 29 FCC Rcd 2374, ¶ 6 (“NPRM”) (“[W]e encourage industry public safety entities, and other stakeholders to work collaboratively to develop alternative proposals for our consideration.”); id. ¶ 26 (“[W]e invite relevant stakeholders – including public safety and industry – to propose a consensus approach”).

<sup>3</sup> APCO, NENA, Carrier Cover Letter Roadmap for Improving E911 Location Accuracy filed 11/18/2014 <http://apps.fcc.gov/ecfs/document/view?id=60000986637>

<sup>4</sup> NPRM ¶ 26.

address.”<sup>5</sup> To introduce wireless carrier-delivered, dispatchable addresses to the public safety lexicon, the Roadmap encompasses a bold new paradigm: “indoor” (address) and “outdoor” (X and Y coordinates) locations. It does so, in part, because even the best outdoor technologies currently available, when applied to indoor location, can only provide a 50-meter search radius. For most urban environments, this represents one or more multi-story buildings on a city block, and for indoor location, this is not acceptable, particularly in the long term.

By adopting a technology-neutral approach that encourages carriers to leverage existing commercial location-based service technologies, the Roadmap will facilitate real improvements in the delivery of useable emergency location information for both indoor and outdoor wireless 911 calls. Yet, the Roadmap does not abandon efforts to continue improving location solutions based on the use of x, y coordinates. In combination these initiatives render criticism of the Roadmap, at a minimum, premature.

The Roadmap identifies concrete initiatives that will be undertaken to promote improved location accuracy using such technologies. This includes near-term deadlines 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 quickly as expected or desired. The Roadmap identifies 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. Finally, the Roadmap goes beyond a voluntary agreement among the carriers and public safety, and asks the Commission to codify certain of its provisions in order to provide greater assurance that the objectives of the Roadmap will be met.

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<sup>5</sup> NPRM ¶ 117.

As significant as the Roadmap is, it could not detail every technical or process issue and work remains for all parties.<sup>6</sup> For example, public safety, carriers and the vendor community need to reach consensus on address validation, and an appropriate dispatchable address standard for fixed-location wireless customers is needed. Important dialogs with cable / broadband, the alarm industry and other in-home technology providers could be initiated as a way to increase the density of indoor beacon technology (e.g., a beacon in cable TV boxes or smoke alarms). Exploration of new and novel “crowd sourcing” location techniques should be encouraged. Approaches to vertical (Z-axis) information need to be explored including, but not limited to, use of barometric pressure (as identified in the Roadmap).

Intrado believes that the Roadmap is what it professes to be: a realistic, effective, sustainable, *initial* framework that lays the foundation for continuous improvement of 911 location accuracy. Intrado looks forward to working with the Commission, the public safety and carrier communities and other stakeholders to implement the Roadmap and further advance 911 location technology and services.

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Respectfully submitted,

**Intrado Inc. and Intrado Communications Inc.**

/s/ Craig W. Donaldson

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<sup>6</sup> Workgroups have already been announced to continue the evolution of the Roadmap.