



December 15, 2014 @ 0700

Tom Wheeler, Chairman
Federal Communications Commission
Washington, D.C.

Reference: Docket 07-114 - Wireless 9-1-1 Location Accuracy - Comments submitted pertaining to

Dear Chairman Wheeler:

The Fairfax County Virginia Department of Public Safety Communications (DPSC) shares the concerns of many 9-1-1 Public Safety Answering Points (PSAPs), that location accuracy for wireless 9-1-1 calls is a critically important area requiring continued improvement by the industry and for Federal Communications Commission (FCC) focus and oversight. We support the FCC's efforts to improve location accuracy for wireless 9-1-1 calls in a prudent, technology neutral, yet appropriately aggressive manner and schedule. Better and more accurate wireless 9-1-1 location serves the interests of the public and is a commitment the 9-1-1 PSAP community strives for 24/7/365.

As a large metropolitan PSAP, DPSC was not involved in the development of the recent Location Accuracy Roadmap proposed by the Association of Public-Safety Officials (APCO), the National Emergency Number Association (NENA) and the four major wireless carriers.....AT&T, Sprint, T-Mobile and Verizon. The agreement, "Roadmap", has many laudable objectives, and has generated considerable discussion.....both for and against, much media attention, proponent and opponent educational webinars, etc. We recognize it is a complicated process to provide 9-1-1 centers "dispatchable" addresses and encourage the FCC to involve PSAPs more directly as an integral part of any final agreement the FCC may approve or adopt.

In other matters before the Commission, it has been reported that you are looking for ways to "split the baby" to achieve an agreeable way forward. Our preference on the matter of wireless 9-1-1 location accuracy would be for the FCC to "hold the horses" (on the "Roadmap") and "strike a balance" (bifurcate the new FCC proposed standard for indoor location accuracy).

We have valid concerns about adopting the "Roadmap" contained in the proposed agreement (e.g., setting the percentage of all calls [indoor and outdoor] at a lower percentage standard for all calls such as 40% within two years). Yet we also feel the

FCC's singular standard for location accuracy (67% for indoor calls within two years and 80% within five years) does not account for the necessity to allow nascent indoor accuracy measurements to "catch up" on a separate (but appropriately aggressive) schedule to the stricter and more mature measurements for outdoor locations.

We support the intent of the APCO and NENA agreement with the carriers, but feel that certain elements of the Roadmap, such as the National Emergency Address Database (NEAD) should be addressed as a secondary discussion, as the costs, location, management, and provisioning of the NEAD are so preliminary in scope and definition that an agreement to its purpose and role in NG9-1-1 make signing an agreement to it....premature. The concept of NEAD is interesting, but the practical impact of who will pay for the implementation is currently unclear and an area the PSAP community needs to better understand before endorsing its adoption.

We support the FCC's establishment of indoor accuracy requirements at the highest possible levels within two years. Reaching 67% within two years appears to be a concern for the carrier community so we advocate a graduated, incremental indoor standard that is more aggressive than the 40% contained in the Roadmap, but less than the FCC proposed 67%. We ask that the FCC allow this standard to be mutually agreed to with the carriers at a level above 50% within two years and to incrementally adjust upward to 80% within four years. Measurements of these standards should include only indoor wireless calls. Outdoor wireless calls should also be separately measured and should be held to higher performance levels and aggressive time schedules for improvements.

Being directly involved in any final process of endorsing the new standards or adjusted Roadmap will allow PSAPs to suggest areas of clarification. To this point we submit the following five (5) points for consideration by the FCC at this time:

1. How will the PSAPs know directly when they are getting the new heightened location accuracy data? Is there a new Class of Service for these calls?
2. What type of security protection will be provided the US 9-1-1 system, including state and local government owned sub-parts of same, from hacking, disruption, breaching, etc. by foreign or domestic intrusion? What is the impact of introducing the Russian GLONASS satellite system more directly into 9-1-1 call processing? Is the European Union satellite system Galileo a better/safer/more secure alternative?
3. Clarify in any final agreement an overall schedule of the proposed tests, benchmarks for indoor and outdoor wireless calls so that the PSAP community has an integrated, single view of what the FCC is proposing as the new standards for location accuracy.
4. How is it proposed to fund new database contained in the "Roadmap" (NEAD - (National Emergency Address Database)? Does its inclusion in the "Roadmap"

substitute costs to be borne by the PSAPs for database access charges that are currently paid for the use of the legacy Selective Router network? Is it necessary to propagate similar database costs paid to the carriers into the future?

5. How does NEAD fit into the NENA i3 plan and will its inclusion take away funding for NG9-1-1?

In short, we believe the final order of the Commission in this matter should reflect the fundamental tenetscloser is better than farther, sooner is better than later, directed is better than voluntary and clarity is better than ambiguous. It has been 20 years since the FCC issued Report & Order 94-102. In 1994 approximately 20% of 9-1-1 call were received from wireless telephones. In 2014 wireless 9-1-1 calls have risen to approximately 75% of total 9-1-1 call volume. During this 20 year period the PSAP community, and the public it supports, have waited patiently for wireless 9-1-1 location accuracy to improve.

Thank you for your strong interest in and advocacy of matters impacting 9-1-1; the gateway through which, approximately 240 million times each year, the public calls 9-1-1 in their time of need and emergency, resulting in a 9-1-1 public safety calltaker/dispatcher answering the call with; **"9-1-1 where is your emergency"**.....because "where" is the most important information on any 9-1-1 call.....not "when", not "why" and not "how"....but "where". This is because many callers do not know where they located and current location technology provided by carriers do not always accurately provide the location of the caller, which is why wireless 9-1-1 location accuracy must improve.

Respectfully and with appreciation.

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