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December 8, 2014

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Ms. Marlene H. Dortch, Secretary
 Federal Communications Commission
 445 12th Street SW
 Washington, D.C. 20554

Dear Ms. Dortch:

RE: Wireless E9-1-1 Location Accuracy Requirements, PS Docket No. 07-114

On behalf of the NYS 911 Coordinators Association and our more than 150 members from across the Empire State, I write to express our strong support for the location accuracy agreement recently concluded between NENA, APCO and the 4 national wireless carriers.

Today's latitude/longitude based Wireless E9-1-1 systems are critically important to the efficiency and effectiveness of public safety services. These systems must be improved, and we commend the parties to the Agreement for including specific, measurable targets for "x-y" improvements at the 50m level proposed by the Commission. The technology improvements required to meet those targets will be substantial and the results will be a significant improvement in outdoor accuracy and both indoor accuracy and yield.

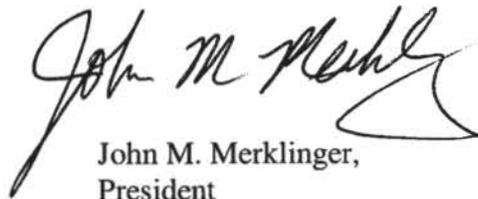
More importantly, however, we wholeheartedly endorse the deployment of "Dispatchable Location" technology for wireless 9-1-1 calls contemplated by the agreement. Since the Enhanced 9-1-1 service was originally deployed, Automatic Location Identification for wireline calls has made available the caller's physical address to 9-1-1 centers. This allows reliable, immediate dispatch of appropriate field responders, and provides key

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route insight for responding units. That same level of service has never before been available to wireless 9-1-1 callers. Enabling Dispatchable Location delivery will provide a wireline-like level of service for wireless callers, saving lives and preserving property.

Both of these improvements are critical for consumers and public safety professionals in New York State: Latitude/longitude improvements will speed responses to emergencies on our heavily-used lakes and rivers, and Dispatchable Location improvements will provide faster and better responses for residents at hundreds of dormitories, apartment complexes and office buildings throughout our state. Because our association supports these and other critical improvements required by the Roadmap Agreement, we urge the Commission to quickly codify its relevant provisions and to support its ongoing implementation whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Merklinger". The signature is fluid and cursive, with a large, sweeping flourish at the end.

John M. Merklinger,
President