



FRATERNAL ORDER OF POLICE

CAPITAL CITY LODGE # 9 • 6800 Schrock Hill Ct. • Columbus, Ohio 43229
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Secretary Marlene H. Dortch
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

December 16, 2014

Re: PS Docket No. 07-114

Secretary Dortch,

The Fraternal Order of Police, Capital City Lodge No. 9, represents over 3,000 active duty police officers across Franklin County Ohio. Our members work hard everyday to protect the community and protect their fellow officers.

As you are aware, our current 9-1-1 service was developed 46 years ago to provide aid and assistance to both victims and first responders in cases of emergency. The information collected during these calls for help is vital for police officers to perform their duties and to provide victims the assurance that help is on its way.

The current location system that is now in place is highly effective when a landline is being used to call 9-1-1, however in today's world many homes have gone completely wireless and eliminated their landlines, making mobile phones their main line of communication. Additionally, there is currently pending legislation that would allow telecommunications providers to eliminate maintaining land lines. With mobile location accuracy technology being unreliable indoors, in densely populated areas, or in areas where signal strength is obstructed, this creates a deficit in the service provided to 9-1-1 callers. Further, many times during a 9-1-1 call the caller is not coherent, is confused, or cannot communicate directly with the dispatcher. An individual in an emergency situation inside an unknown building or home is at a great disadvantage. If that individual calls from a landline then dispatchers can identify a physical address, but if they call from a cell phone the location service is inaccurate and could mean delayed assistance. Given the current plan proposed by cell phone companies there is no assurance that technologies would be developed to help accurately locate them in their time of crisis. That is an unacceptable proposition and a breach of the 9-1-1 social contract. I would request that the FCC require cell phone companies to develop technology to ensure location accuracy. Benchmarks should be set to test and ensure that the applications are working properly to ensure protection for all citizens.

Our dispatchers need to be able to send emergency services even if that caller is unable to vocalize their situation or location, in order to do so the dispatcher needs to be able to first locate

REPRESENTING OVER 4,300 LAW ENFORCEMENT OFFICERS IN FRANKLIN COUNTY

www.fop9.org





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that caller. The original proposal from the FCC would go a long way into making sure that both dispatchers and emergency services are able to do their jobs. Unfortunately there is no FCC Location requirement in place for calls originating indoors. Please do not ignore the urgency of this situation. Implementing the update on indoor location accuracy standards will not only greatly increase the efficiency of the dispatch and emergency service systems, but allow us the potential to save more lives.

Sincerely,

Jason Pappas,
President
FOP Lodge #9

Cc: Sen. Sherrod Brown
Sen. Rob Portman
Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
RADM David Simpson
Daniel Alvarez, Legal Advisor to Chairman Wheeler
David Goldman, Legal Advisor to Commissioner Rosenworcel