

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

December XX, 2014

Re: PS Docket No. 07-114 Wireless Location Accuracy Requirements

Secretary Dortch,

The American Ambulance Association (The AAA) is writing today to file reply comments regarding the “Road Map” proposal by the wireless phone companies.

The AAA represents ambulance services across the United States that participate in serving more than 75% of the U.S. population with emergency and nonemergency care and medical transportation services. The AAA was formed in response to the need for improvements in medical transportation and emergency medical services. The Association services as a voice and clearinghouse for ambulance services across the nation.

The AAA views prehospital care not only as a public service, but also as an essential part of the public health care and public safety system. Ambulance and EMS personnel are on the front line serving every day as first responders to those with an acute and critical illness or injury. If the dispatcher cannot identify the location of the caller reporting a medical emergency lives will be lost. The FCC estimates that 10,000 people die every year because emergency personnel don’t have the tools to locate and help them.

The “Road Map” is inferior to the FCC proposed rules, and is designed to delay the implementation, and lowers or eliminates benchmarks to success.

In fact, several national first responder organizations have filed comments urging the FCC **not** to adopt the “Road Map”. Some of these organizations are the [National Association of Emergency Medical Services Physicians, the National Association of Emergency Medical Technicians, The National Association of State Emergency Medical Services Officials and the National Emergency Medical Services Management Association, the National Sheriffs Association, the International Association of Fire Chiefs, the Fraternal Order of Police, the International Association of Firefighters and many more].

Our members know firsthand the agony and frustration caused when people in need of help cannot be located. The technology to correct this growing crisis is available, but the wireless phone companies doing all that they can to avoid the responsibility of implementing the updated standards.

The FCC proposal is the only plan that will advance public safety and save lives.

Sincerely,

Cc: 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