



December 19, 2014

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

Re: PS Docket No. 07-114 - Wireless E911 Location Accuracy Requirements

Dear Secretary Dortch;

The American Ambulance Association (AAA) greatly appreciates the opportunity to file reply comments regarding the “Road Map” proposal on Wireless E911 Location Accuracy Requirements.

The AAA is the primary trade association for ambulance service providers and suppliers in the United States. We promote health care policies that ensure excellence in the ambulance services industry and provide research, education, and communications programs to enable our members to effectively address the needs of the diverse communities they serve. AAA members provide coverage to more than 75 percent of the U.S. population with emergency and non-emergency ambulance services.

The AAA views pre-hospital care not only as a public service but also as an essential part of the public health care and safety system. Emergency medical service (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 911 dispatcher cannot identify the location of the caller reporting a medical emergency, then lives could be lost. The FCC estimates that 10,000 people die every year because emergency personnel don’t have the proper tools to locate and help people in need of emergency services.

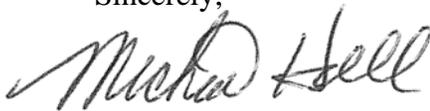
The AAA believes the “Road Map” to be significantly inferior to the FCC proposed rules on wireless location accuracy requirements. Several national first responder organizations have already filed comments urging the FCC **not** to adopt the “Road Map”. You can now add the AAA to the list of organizations including 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 others in opposing the “Road Map”.

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

Should you or your staff have any questions on this issue, please do hesitate to contact AAA Senior Vice President of Government Affairs Tristan North. He can be reached at tnorth@the-aaa.org or 703-610-0216.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Mike Hall". The signature is written in a cursive, flowing style.

Mike Hall
President

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