



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

Re: Road Map Reply Comments, Wireless E911 Location Accuracy, PS Docket  
No. 07-114

Dear Ms. Dortch:

On behalf of the California Chapter of the American College of Emergency Physicians (California ACEP) and the Emergency Medical Services (EMS) Medical Directors Association of California (EMDAC), we hereby file our reply comments to the Road Map jointly proposed by APCO, NENA and the four major cell phone companies. California ACEP and EMDAC have filed previously on the subject of indoor location accuracy. Having reviewed the Roadmap, we reaffirm our position and emphatically call upon the Federal Communications Commission (FCC) to adopt its proposed rules as written and on the proposed timeline.

The Road Map expresses a reasonable aspirational goal of “dispatchable address”, but significantly weakens accountability for indoor location accuracy or vertical accuracy. The benchmarks set forth in the Road Map not only set a much lower requirement, but the methodology for calculating whether or not the wireless carriers have achieved the benchmarks contain a number of loopholes. Further, the benchmarks contain gaps for persons who do not purchase a newer phone with the technologies covered by the benchmarks. Consequently, millions of persons in the United States may not have indoor location accuracy or perhaps location accuracy at all. Adopting these benchmarks will cost lives. Adopting the slower timeline, especially when technologies exist now, will cost lives.

We urge the FCC to reject the Road Map and adopt the proposed rules and on the proposed timeline as quickly as possible. Lives depend on it.

Sincerely,

Angelo Salvucci, MD, FACEP