



Ventura County Public Health

A Division of the Ventura County Health Care Agency

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December 24, 2014

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:

I am replying to the comments dated December 16, 2014 and filed by Charles Miramonti, MD, Chief of Indianapolis EMS. Dr. Miramonti's letter advocates for the Road Map and states that the Road Map is the best way to achieve the objective of providing accurate location information to first responders. He does so without technical or analytical support for this assertion that the Road Map is "best" or that it is better than the FCC's proposed rules or any other plan. I respectfully disagree with him.

I am the Medical Director of the Santa Barbara County and Ventura County, California EMS systems. I also am the Associate Medical Director of an aeromedical service and former Chair of the California Commission on Emergency Medical Services. I have been actively interested in the efficiency of 9-1-1 systems and their effect on emergency medical outcomes for over 20 years. I have examined both the FCC's proposed rules and the Road Map. The Road Map does not actually commit the wireless carriers to deliver, ever, a dispatchable address. The Road Map uses the same 50 meters in the FCC's proposed rules, but allow a lower percentage of achievement, on a slower schedule, and with a formula that allows the carriers to satisfy the new "blended composite of indoor and outdoor" location accuracy by boosting outdoor performance, since their chosen technologies do not work well indoors. While touting the virtues of getting first responders to a victim's door, the Road Map relaxes any requirement for vertical accuracy, substituting a promise to study the matter for a few years. Without a strong vertical requirement, the promise of a dispatchable address or dispatchable location is meaningless.

While I am positive that Dr. Miramonti and I share the same goal of achieving the best medical results for victims by getting first responders and emergency care to them as quickly as possible, I submit that the Road Map is inadequate to achieve that goal.

I 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,

A handwritten signature in blue ink, appearing to read "Angelo Salvucci", with a stylized flourish at the end.

Angelo Salvucci, MD, FACEP