



The California Chapter of the National Emergency Number Association

December 27, 2014

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

Re: Wireless 9-1-1 Caller Location Accuracy Requirements, PS Docket No. 07-114

Dear Ms. Dortch,

The California Chapter of the National Emergency Number Association (CALNENA) remains steadfast in our support of the FCC's Third Further Notice of Proposed Rulemaking (TFNPR), as it represents the best path forward to improve the delivery of accurate caller location information on all wireless 9-1-1 calls. The FCC's proposal is fair and the timeframe contained therein addresses the urgent need for improvements to the 9-1-1 system.

CALNENA applauds the National Emergency Number Association (NENA) and the Association of Public-Safety Communications Officials (APCO) in their efforts to negotiate an alternative agreement (Roadmap) with representatives of the four largest wireless service providers (WSPs). The Roadmap's recommendation to develop and implement a technology neutral test bed within 12 months, in accordance with Communications Security, Reliability and Interoperability Council (CSRIC) III Working Group recommendations, should be included in the FCC's final rule. However, the remaining major components of the Roadmap contain prolonged timelines and lack the accountability and enforcement that is required to ensure that progress is made and that it is made in a timely manner.

By comparison, CALNENA believes that the FCC's TFNPR offers the best chance for timely and meaningful improvements to the delivery of accurate caller location information on all wireless 9-1-1 calls. The FCC's benchmarks and requirements for horizontal and vertical location information on all wireless 9-1-1 calls are realistic and can be achieved today with existing technology. Additionally, the FCC's proposed rule is technology neutral.

If there is any consideration given to modifying the TFNPR, CALNENA asks the FCC to consider more stringent requirements. For instance:

Reduce the Time Threshold. Reduce the time threshold to a maximum of 15 seconds for the routing of accurate caller location information to the public safety

answering point (PSAP) on indoor and outdoor wireless 9-1-1 calls. The technology exists and should be utilized today. Thirty seconds is too long to wait for accurate caller location information, especially if there is any hope of routing wireless 9-1-1 calls to the correct PSAP using GPS coordinates.

Eliminate Re-bidding Requirements. Eliminate re-bidding requirements, as including them in the rule would seem to codify re-bidding as a practice that will be required indefinitely. In light of significant advancements in wireless location technology over the past 18 years, CALNENA urges the FCC to reach further and motivate the WSPs to continue developing and deploying technologies that accelerate the timely delivery of accurate wireless 9-1-1 caller location information and eliminate, or at least significantly reduce, the need for the call-taker to re-bid for this critical information. As a matter of public safety, it is counterproductive to require a call-taker to conduct a re-bid – or multiple re-bids – and divert his or her attention from a distressed caller, while attempting to gather additional important information. Re-bidding should only be used when information isn't being received, not to challenge the *initial* information in order to receive *accurate* information.

CALNENA appreciates the FCC's continued attention to the critical matter of improving the timely delivery of accurate caller location information on all wireless 9-1-1 calls. We look forward to the implementation of the FCC's rule and hope that it will provide the progress that is desperately needed today by our public safety dispatchers and the people who rely on 9-1-1 when they need emergency assistance.

Respectfully,



Danita L. Crombach, ENP
CALNENA President