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Leaders in Public Safety Communications®

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January 21, 2015

Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: Wireless E9-1-1 Location Accuracy Requirements, PS Docket No. 07-114

Dear Ms. Dortch:

The Association of Public-Safety Communications Officials-International, Inc. (APCO) submits these written ex parte comments to reiterate our support for the Roadmap for Improving E911 Location Accuracy we developed with the National Emergency Number Association (NENA) and the four largest wireless carriers.¹ The Commission explicitly invited stakeholders to develop an alternative approach to its own proposals.² With our decades of experience, expertise, and leadership in 911 communications, APCO worked with NENA to successfully ensure, following a period of seven months of negotiations, that the carriers committed to taking the measures necessary to best improve 911 location accuracy.

The Roadmap is designed to produce a dispatchable location – defined as the “civic address of the calling party plus additional information such as floor, suite, apartment or similar information that may be needed to adequately identify the location of the calling party.” Dispatchable location is public safety’s gold standard for indoor location accuracy.

Dispatchable location will provide what the public expects: the equivalent of a landline telephone call. Consider the urgent and compelling use case of a caller located deep inside a skyscraper reporting a medical emergency, who falls unconscious after dialing 911. Delivering a dispatchable location to 911

¹ See Letter from John Wright, APCO, Charles W. McKee, Sprint, Joan Marsh, AT&T Services, Inc., Kathleen O’Brien Ham, T-Mobile USA, Christy Williams, NENA, and Kathleen Grillo, Verizon, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket No. 07-114 (filed Nov. 18, 2014), Attachment A, “Roadmap for Improving E911 Location Accuracy” (the “Roadmap”).

² *Wireless E911 Location Accuracy Requirements*, Third Further Notice of Proposed Rulemaking, 29 FCC Rcd 2374, ¶ 26 (2014); see also ¶ 6 (“[W]e encourage industry public safety entities, and other stakeholders to work collaboratively to develop alternative proposals for our consideration.”).

Public Safety Answering Points is far superior to other alternatives because it will lead to the quickest response and best ensure the safety of the caller.

Since submitting the Roadmap to the Commission, APCO, along with our partners, reached out extensively to numerous stakeholders. The ensuing productive discussions, and the record generated in response to the Roadmap, indicate widespread and substantial support for a dispatchable location solution. At the same time, some understandably seek further assurances that a dispatchable location solution will be achieved.

Thus, in recent weeks we asked the carriers to commit to additional measures that would strengthen the Roadmap's objective of a dispatchable location. As a result, we are pleased to report that the carriers have agreed to build in even greater assurances related to both dispatchable location and a z-axis solution. Recently, the carriers presented these assurances to the Public Safety Bureau.³ Specifically, the carriers are pledging to deploy, in the 50 most populous CMAs, a significant number of dispatchable location reference points (i.e. Wi-Fi access points or Bluetooth LE beacons), or a z-axis solution that provides coverage to at least 80% of the population of the CMA.

APCO supports these additional commitments because they provide increased confidence that the carriers will implement a dispatchable location solution, and are thus preferable to alternatives offered in the record. The Roadmap, with additional assurances, is the superior way to achieve improved wireless location accuracy. Further, any additional assurances the Commission may consider should be technology-neutral and break public safety out of the cycle of reliance on imperfect, single-source or proprietary solutions to solve 911 problems.

Respectfully Submitted,

/s/ Derek K. Poarch
Executive Director
APCO International

³ See Letter from Joan Marsh, AT&T Services, Inc., Kathleen O'Brien Ham, T-Mobile USA, Ray Rothermel, Sprint, and Kathleen Grillo, Verizon, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket No. 07-114 (filed January 21, 2015).