

NENA

The 9-1-1 Association

1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Ms. Marlene H. Dortch, *Secretary*
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20555

January 21st, 2015

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

Dear Ms. Dortch:

Following the Commission's invitation, in its Third Further Notice of Proposed Rulemaking in this proceeding, last year, NENA joined with our colleagues at APCO and representatives from the nation's four largest wireless carriers to conclude an historic Roadmap agreement that sets out a future vision for Wireless E9-1-1 location accuracy. The Roadmap is the product of many months of intensive negotiations and technical analysis, and represents the most robust agreement our organization could achieve in partnership with the carriers.

NENA believes that the Roadmap sets out a clear vision for how 9-1-1 centers can receive accurate and actionable location information for all 9-1-1 calls in the future. By introducing support for Dispatchable Location technology in handsets and carrier networks, NENA is convinced that the Roadmap offers a solid foundation on which the Commission's approach to 9-1-1 location accuracy rules can be built.

Over the past several weeks, we asked the carriers to commit to additional measures that would strengthen Roadmap's objective of returning a Dispatchable Location for the largest possible fraction of wireless E9-1-1 calls. As a result, we are pleased to report that the carriers have agreed to build-in great assurances related to both dispatchable location and to the deployment of a z-axis solution. Those assurances were presented to the Commission's Public Safety and Homeland Security Bureau today. Specifically, the carriers have pledged to deploy, in each of the 50 most populous Cellular Market Areas ("CMAs"), a significant number of dispatchable location reference points (i.e., WiFi access points and/or Bluetooth Low Energy beacons), or a z-axis solution that provides coverage to at least 80% of the population.

NENA is pleased that the Carriers have agreed to these additional commitments, and believes that the commitments represent a material improvement over the initial terms of the Roadmap. At the same time, we recognize that the Commission is bound to consider the entirety of the record as it formulates final rules. Likewise, NENA is cognizant of the concerns expressed by our colleagues from other public safety associations who call on the Commission to include additional assurances and metrics for evaluating carrier compliance with the terms of the Roadmap and with the ultimate goal of locating callers in need.

Recently, there have been press reports related to provisions of the circulating draft Report and Order which indicate that it may go beyond the strict letter of the Roadmap, or even of these further assurances. While NENA continues to believe strongly in the many virtues of the Roadmap, we are prepared to support, in principle, elements of a Report and Order that may yet be required to adequately address the reasonable and understandable concerns of the broader public safety community. In crafting its final rules, NENA urges the Commission to align any such elements with the structural framework of the Roadmap as closely as practicable while still discharging its legal obligations arising from the record.

As always, NENA strongly supports the Commission's efforts to improve 9-1-1 location accuracy for all consumers, and urges the Commission to act with dispatch in finalizing new location accuracy rules.

Sincerely,

A handwritten signature in cursive script, reading "T. E. Forgety, III". The signature is written in black ink and is positioned above the printed name and title.

Telford E. Forgety, III

Director of Government Affairs