

Telecommunications for the Deaf and Hard of Hearing, Inc.
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January 22, 2015

via electronic filing

Marlene H. Dortch
Secretary, Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

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

Dear Ms. Dortch,

Between January 20 and January 22, Telecommunications for the Deaf and Hard of Hearing Inc. (TDI) and the National Association of the Deaf (NAD) met with several Commissioners offices to discuss important deaf and hard of hearing accessibility issues related to wireless E9-1-1 location accuracy. On January 20, 2015 I met with Mr. Louis Peraertz, Legal Advisor with the office of Commissioner Clyburn. The following day, on January 21, Andrew Phillips, Policy Counsel at the NAD joined me in meeting with Ms. Priscilla Delagdo Argeris, Legal Advisor with the office of Commissioner Jessica Rosenworcel, and later Mr. Brendan Carr, Legal Advisor with the office of Commissioner Ajit Pai. Then on January 22, 2015 we met separately with Mr. Daniel Alvarez, Legal Advisor with the office of Chairman Tom Wheeler, and Ms. Erin McGrath, Legal Advisor with the office of Commissioner Michael O’Rielly.

We shared our organizations’ positions on the key issues within the Commission’s draft Report and Order for wireless E9-1-1 location accuracy requirements. Among the key points we made in the meetings were:

1.) We thanked the Commission for its leadership on improving public safety and access to 9-1-1 services. We commend the five Commissioner offices and the Public Safety and Homeland Security Bureau for the work they have done on improving E9-1-1 location accuracy and bringing this item to fruition.

2.) We stressed the importance of making sure that deaf and hard of hearing Americans have full access to emergency calls and explained that E9-1-1 localization technology is very important for our community. For instance, if we call 911 through the relay service, we sometimes have to explain to the relay operator where we are located and then the operator has to figure out the closest PSAP (many people pre-load their relay equipment with their permanent address but more and more relay calls are made from mobile devices where one’s location is always changing). This process wastes valuable time during emergencies and many of us need a way to notify emergency services of our location immediately. With E9-1-1 location accuracy, we can dial 911 directly and with little or no spoken communication, the PSAP should send help to our exact location.

3.) It is important to update the 911 rules to reflect available technologies and eliminate the indoor exemption. We understand that the Commission is leaning towards producing the lower thresholds and one year delays (adding one year to the 2-year horizontal requirement, lowering the interim percentage to 50% and adding one year to the 5-year requirement). It has not been our preference but it is certainly understandable in addressing the concerns from the four major wireless carriers – Verizon, AT&T, Sprint, and T-Mobile USA.

4.) Vertical location identification is critically important and we are disappointed that the “interim” requirement for vertical appears not to be a major part of the draft rules. We reiterated that vertical accuracy is a key goal and what the communities we represent need, so we can be located when we call 911 and cannot communicate our location for whatever reason. We prefer an interim vertical requirement, but we can support the item in its current form if the FCC retains the 3-year /50% requirement for horizontal accuracy, retains the 6-year/80% requirement for both horizontal and vertical. It is important that there not be any further deterioration of the Commission’s tentative requirements between now and when the Commission formally acts on January 29.

5.) Overall, if the 3 and 6 year benchmarks are protected and the carriers be held fully accountable for the live call results, the draft order represents a reasonable compromise that has our support. Thus, we urge the full Commission approval.

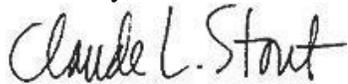
6.) The Commission should encourage further effort by having appropriate open and transparent bodies (e.g., CSRIC) study elements of the Roadmap such as the test bed setup, NEAD and it’s privacy, reliability, and funding aspects.

7.) We raised some questions and concerns about what metrics will be used to evaluate accuracy, reliability, percentage of successfully located indoor calls, validation, and progress toward the goals of improved E911 accuracy across the board. We asked for enforceable, reasonable, and representative metrics. And it must be done in a way that the FCC can enforce them. With respect to outdoor versus indoor metrics versus total metrics, we see a need for assessing both separately, in order to ensure that improvements in outdoor location accuracy do not artificially inflate progress toward our targets, even if indoor location accuracy were to remain poor.

8.) Last, but not least, we asked that whatever immediate decisions the Commission makes for this area, consumer groups and other stakeholders participate fully in the implementation process with the wireless industry, the third-party suppliers of the indoor location technologies, NENA, and APCO.

It is therefore critical that the Commission move forward expeditiously to act on its draft rules for wireless e9-1-1 location accuracy and begin the process of protecting wireless callers indoors as well as they do outdoors. Most importantly, whatever rules are adopted need to promote continued improvement in wireless E9-1-1 location accuracy.

Sincerely,



Claude L. Stout

Executive Director

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)

cc: Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Daniel Alvarez
Louis Peraertz
Priscilla Delgado Argeris
Brendan Carr
Erin McGrath
David Simpson
David Furth
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