



INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS

HAROLD A. SCHAITBERGER
General President

THOMAS H. MILLER
General Secretary-Treasurer

January 23, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: P.S. Docket No. 07-114, Wireless E911 Location Accuracy Requirements

Dear Ms. Dortch:

On January 22, 2015, Harold A. Schaitberger, General President and Kevin O'Connor, Assistant to the General President of the International Association of Fire Fighters, participated in meetings with Commissioner Jessica Rosenworcel and Commissioner Mignon Clyburn regarding P.S. Docket No. 07-114 regarding Wireless E911 Location Accuracy Requirements.

The IAFF reiterated its support for the Commission's work thus far to improve E911 location accuracy. In particular, the IAFF noted the critical importance of including vertical accuracy requirements in the final rule. As we have consistently noted, the Commission's proposal to establish a three meter vertical accuracy requirement will vastly improve the ability of first responders to locate indoor calls, reducing response times and significantly enhancing the public safety. Vertical accuracy requirements will also improve the safety of responding personnel by providing for a directed search and thus reducing responder stress and disorientation.

The IAFF requested that the final rule restore the three meter vertical accuracy requirement within three years. Establishing a three year timeline will ensure that carriers begin to implement new technology today.

Furthermore, in response to a question posted by Commissioner Clyburn about the necessity of vertical location measurements if a dispatchable address were available, we responded that, even if technologically feasible, a dispatchable address may not be sufficient. In an emergency situation, an individual would move within a building attempting to escape a fire and other emergency. As a person moves through a structure within a floor or between floors, barometric pressure technology could potentially be utilized to allow an emergency responder to locate such an individual.

Lastly, the IAFF requested that the final rule maintain that satellite-assisted calls be excluded from the measurement for live call testing demonstrating compliance with indoor location accuracy requirements. Proposals to blend indoor and outdoor results would result in data of little to no value in evaluating indoor location performance.

As always, we appreciate the Commission's attention to this critical public safety matter and its continued commitment to improving the communications capabilities of our nation's frontline emergency responders.

Sincerely,

Kevin O'Connor
Assistant to the General President

