

To: David Simpson <David.Simpson@fcc.gov>

Subject: RE: GA TV Report on 9-1-1 Call Misroute resulting in fatality; Request for action on Phase I Misroutes.

Admiral Simpson,

Thank you for your recent e-mail responding to BRETSA's February 5, 2015 letter regarding Phase I Misroutes of 9-1-1 Calls.

BRETSA respectfully submits that PSAPs, First Responders and the public cannot wait for a further record to be developed through implementation of the Commission's Fourth Report and Order in Docket No. 07-114, for remediation of Phase I Misroutes. To put the issue in perspective:

--The Longmont, Colorado PSAP supported by BRETSA receives approximately 5 Phase I misroutes per dispatcher per shift, or about 30 such calls *per day*.

--The PSAP receives about 5 calls per week which require requests to the carrier to "ping" a device location (through an anachronistic procedure requiring the PSAP to first determine which carrier serves the user then request the locate service through an exchange of forms *by fax* before the carrier even begins to locate the device, and taking up to 20 minutes). These calls usually involve suicidal callers who refuse to provide their location or disconnect the call, or suicidal individuals who call friends or family who relay the suicide threats and the person's telephone number to the PSAP.

--The PSAP receives less than one call per week where it must request a provider to ping for the location of a caller who does not know where he/she is or cannot communicate his/her location to the PSAP.

While we understand Phase I misroutes may be rare for some rural jurisdictions with no communities or highways located near their jurisdictional boundaries, BRETSA also understands the experience of the Longmont PSAP (and the other PSAPs supported by BRETSA) is typical of PSAPs located in urban and suburban areas.

In short, the Commission has acted to address Phase II Call information accuracy (certainly an important issue), when (i) exponentially more 9-1-1 calls require carrier's to "ping" for device locations *for reasons other than callers not being able to provide their location when Phase II data is not available or accurate*, and (ii) exponentially more calls are Phase I misrouted than require PSAPs to request carrier's ping for a device location. The Commission having taken action to remediate the most infrequent cause of delays in Emergency Response; BRETSA urges the Commission to act expeditiously to address the most frequent cause of such delays: Phase I Misroutes.

We would also be please to provide additional information regarding GIS data available to PSAPs.

Again, thank you for your response and your attention to this matter.

Joe

At 2/10/2015 07:42 AM, you wrote:

Joe,

Thank you for flagging this tragedy for us. We will be researching this and the important issue regarding the ambiguity associated with calls along the seams between jurisdictions. I'd add to the list that you provided, the attention that needs to be given underling GIS data that underpins the reconciliation between reported 911 caller location and the dispatch and the mutual aid agreements between jurisdictions. While our recent 911 location order took significant steps to address indoor location, this tragedy reminds us all that we also need to continue to improve outdoor location accuracy and effective dispatch. The more granular reporting and continuous test bed outlined in our recent order should help us better understand the issues and the technologies that might help us address the shortfalls.

Warm regards,

Dave

David G. Simpson
Rear Admiral (ret.), U.S. Navy
Chief
Public Safety & Homeland Security Bureau
Federal Communications Commission
Phone: (202) 418-1304
E-Mail: david.simpson@fcc.gov

-----Original Message-----

From: Joseph P. Benkert [jbenkert@telecommlaw.com]
Sent: Thursday, February 05, 2015 04:51 PM Eastern Standard Time
To: Tom Wheeler; Mignon Clyburn; Jessica Rosenworcel; Ajit Pai; Mike ORIelly
Cc: David Simpson; David Furth; Timothy May
Subject: GA TV Report on 9-1-1 Call Misroute resulting in fatality; Request for action on Phase I Misroutes.

Please see the attached letter on behalf of the Boulder Regional Emergency Telephone Service Authority regarding a GA television news report on a Phase I Misroute of a 9-1-1 call that had fatal consequences, and requesting that the Commission take action to address Phase I Misroutes.

Joseph P Benkert
Joseph P. Benkert, P.C.
Attorney at Law

Telephone 303.948.2200
Facsimile 866.538.8661
E-mail JBenkert@BenkertLaw.com
JBenkert@TelecommLaw.com
JBenkert@Benkert.com

Mail Address:
PO Box 620308
Littleton, CO 80162-0308

Joseph P Benkert
Joseph P. Benkert, P.C.
Attorney at Law

Telephone 303.948.2200
Facsimile 866.538.8661
E-mail JBenkert@BenkertLaw.com
JBenkert@TelecommLaw.com
JBenkert@Benkert.com

Mail Address:
PO Box 620308
Littleton, CO 80162-0308