



**CITY OF  
PHILADELPHIA**  
*Office of Innovation &  
Technology*

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November 19, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554

**Re: Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114**

Dear Ms. Dortch:

The City of Philadelphia receives close to three million 9-1-1 calls per year, nearly one third of all 9-1-1 calls received in the Commonwealth of Pennsylvania. Of those calls more than 77% come from wireless devices. As such the accuracy of the location of a wireless caller is of the highest concern.

The City has contracted with Essential Management Solutions, LLC, a Pennsylvania based consulting firm to provide a 9-1-1 Information Management System (9IMS). 9IMS is a relational database that passively collects data on every 9-1-1 call as soon as it is received by the 9-1-1 center.

The Call Statistics module of the 9IMS provides the City with the ability to access, search and map call data and generate 'real time' reports for a specified time frame. The information contained in the attached report was generated from the Call Statistics module.

This report provides statistics for Philadelphia wireless carriers compared to the Federal Communications Commission requirements from January thru September 2014. The report includes statistics on the initial call as well as the rebid. In addition this report shows the ratio and volume of calls that came in as Phase I verses Phase II. We would respectfully request that this report be reviewed and added to the record.

Thank you for your attention to this matter. If you would like to discuss this further, please contact me.

Sincerely,

Raymond Hayling  
Deputy CIO  
Office of Innovation & Technology