JOSEPH P. BENKERT, P.C.
Attorney at Law
P.O. Box 620308
Littleton, Colorado 80162-0308
Telephone: (303) 948-2200
Facsimile: (866) 538-8661
E-mail: jbenkert@benkert.com

February 23, 2016

Via ECFS and E-Mail: David.Simpson@fcc.gov
Adm. David Simpson (ret.), Chief
Public Safety & Homeland Security Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Location of Non-911 Callers

PS Docket No. 11-153
Text-to-911

PS Docket No. 07-114
Wireless Location Accuracy

Dear Chief Simpson:

The Boulder Regional Emergency Telephone Service Authority ("BRETSA")[1] respectfully requests that you refer certain issues to CSRIC or the Office of Engineering and Technology for consideration, or take other action you may deem appropriate. The issues with which we are concerned involve (i) location of wireless devices which have *not* been used to call 9-1-1, under exigent circumstances ("Non-911 Callers"), (ii) Impacts of transition of wireless technology to LTE-IMS and RTT upon the efficacy of Text-to-911, and (iii) 9-1-1 Wireless Location Accuracy for 9-1-1 Call Routing.

Location of Non-911 Callers.

On November 21, 2012, BRETSA filed a Petition for Rulemaking, which sought in part to address delays in PSAPs requesting and obtaining from CMS providers, under exigent circumstances, location information for individuals who had not called 9-1-1 (the location of an individual's wireless device)("Locate Request" or "Locate Service"). Sub-

[1] BRETSA is a Colorado 9-1-1 Authority which establishes, collects and distributes the Colorado Emergency Telephone Surcharge to fund 9-1-1 Service in Boulder County, Colorado. The BRETSA Board includes the Boulder County Sheriff, the City of Boulder Police Chief, and representatives of the Boulder County Firefighters Association and the City of Longmont Division of Public Safety. The fifth seat of the Board is filled by representatives of the smaller cities and towns in Boulder County, Colorado on a rotating basis. This letter is thus intended to represent the perspective of the entity responsible for funding 9-1-1 operations, *and* of the agencies responsible for PSAP operations and overall public safety services.

sequently, at Exhibit No. 1 to its April 4, 2014 comments on the Commission's January 31, 2014 Policy Statement and Second Further Notice of Proposed Rulemaking in Docket No. 11-153, available at http://apps.fcc.gov/ecfs/document/view?id=7521096988, BRETSA submitted a transcript and voice recording of an all-too typical situation which illustrated the need for more expeditious provision of location information for parties which had not called 9-1-1.[2]

The incident for which BRETSA provided the audio and transcript of the 9-1-1 call and Locate Request involved a young man who had called his friend to say that he was going to commit suicide. Even though the CMS provider waived its requirement that the PSAP take the time to complete and fax a Locate Request *form* for the suicidal individual, the location information was not received in time to save the young man. He stepped in front of a semi on an Interstate highway approximately two minutes before the PSAP which received the call relayed the incident information to the PSAP serving his location; *but twelve minutes after the 9-1-1 call reporting his suicide threats was received*. Four minutes elapsed from the time the 9-1-1 call was received until the call-taker gathered and verified the necessary information, disconnected the call and was able to contact the CMS provider by phone (with the caller able to identify the CMS provider supplying service to the suicidal individual and without the delay of completing and faxing a Locate Request *form*). An additional eight minutes elapsed while the CMS provider determined the location and relayed it to the first PSAP. *In all, over nine minutes elapsed from the time the caller to 9-1-1 provided the suicidal person's phone number until the time the young man stepped in front of the semi; at about the time the CMS provider was completing providing the suicidal person's location to the second PSAP.*

The "Suicide by Semi" incident was not a rare occurrence. The BRETSA-supported PSAP serving the City of Longmont, Colorado (2010 Population 86,437) submits a Locate Request to a CMS provider about five-times per week, usually involving (i) a suicidal individual who has called 9-1-1 but disconnected the call, (ii) a suicidal person who has called a friend or family member threatening suicide, who in turn called 9-1-1 (as in the Suicide by Semi situation), or (iii) an attempt by the PSAP to locate a person with dementia, Alzheimer's disease or similar condition or disability.

While different jurisdictions have different rules and procedures with respect to initiating Locate Requests, they do have rules in place to assure the circumstances are exigent and the request meets Constitutional standards. Generally PSAPs are permitted to make a Locate Request under exigent circumstances before obtaining court permission, but are required to file cellphone ping warrant request with the Court within 72 hours after making the request. BRETSA understands that in most jurisdictions a Locate Request

[2] A copy of the call transcript is attached, and the audio recording of the call, "Suicide By Semi" is available at: http://911colorado.org/911-audio-videos/other-911-calls/ or https://www.youtube.com/watch?feature=player_embedded&v=XeK_1PjoKzo.

must be approved by a PSAP Supervisor, a command or supervisory level law officer, or a City, County or District Attorney as meeting specific criteria. The warrant requests must usually be prepared and filed by a state-certified law officer. Yet, despite local rules and procedures *and judicial review* to assure a Locate Request is made under exigent circumstances and meets Constitutional standards; CMS providers require that PSAPs complete and fax a form to the provider to initiate a Locate Request. The time required to complete and fax the form wastes valuable time, and PSAP personnel taking the call reporting the suicidal individual may not be able to fill-out and send the Locate Request until they have completed the call; other PSAP personnel may be tied up handling other calls or otherwise unable to access the information necessary to initiate the Locate Request. A PSAP may not even be able to identify the specific CMS provider to which the Locate Request must be submitted (the provider supplying service to the individual to be located).

We appreciate the CMS providers' need to protect themselves against liability by having the PSAP verify that the circumstances are exigent. But we believe steps can and should be taken to expedite the submission of and responses to Locate Requests. These may include:

- Implementation of automated electronic Locate Requests through a PSAP CAD or 9-1-1 Telephone System, which the CMS provider could verify originated from a PSAP and which would include PSAP verification that the circumstances are exigent.[3] The purpose would be to facilitate PSAP call-taker submission of Locate Requests during a call, as soon as the phone number for the Locate Request is obtained and exigency determined, and necessary agency approvals obtained. (This would also permit a PSAP to request additional information from the CMS provider for *callers to 9-1-1*, during a 9-1-1 call, when the Phase I or Phase II data was insufficient to locate the caller.)

- Implementation of a shared-portal for Locate Requests. Under this proposal all CMS providers would jointly (i) establish a single portal to receive electronic Locate Requests, and (ii) maintain a portal-database identifying the wireless numbers each provider serves. An electronic Locate Request from any PSAP seeking the location of any wireless subscriber would be submitted to the portal, which would verify the request originated from a PSAP, identify the carrier serving the number to which the Locate Request pertained, route the Locate Request to the appropriate pro-

[3] Where circumstances are not exigent, such as where an investigator wishes to locate a subject or witness, there should be ample time for authorities to obtain a court order or warrant; although a system for submission of PSAP Locate Requests might be designed to also support non-exigent requests based on court orders or warrants.

vider, and assign a transaction number for purposes of tracking and analysis.

- Automation of the Locate Response. BRETSA does not know how CMS Providers process Locate Requests, but presumes the end user's telephone number and perhaps other data have to be manually entered into providers' systems from the faxed Locate Request forms. Submission of electronic format could eliminate this manual entry requirement and the potential for data entry errors at that stage. It is possible that the output of location information from providers' systems could also be transmitted back to the PSAP in electronic format further eliminating the delay inherent in the current Locate Service processes.

- Provision of additional customer information, such as billing address, account holder, additional parties under the account and their wireless numbers, and other information which might assist First Responders in locating the individual might also be provided in response to a Locate Request.

The feasibility of these or alternative solutions to the delays in submitting and receiving responses to Locate Requests should be assessed by a technical body or office. BRETSA also believes the Commission has the authority to adopt rules requiring CMS provider-implementation of solutions, if necessary.

Text-to-911.

BRETSA is concerned that as wireless services migrate to LTE-IMS, vital text-to-911 capabilities will be lost. Specifically, SMS text-messaging over CMS control channels currently allow CMS subscribers to communicate by text message well beyond the area within which CMS coverage is sufficient for subscribers to make voice calls. *See* Comments of the University of Colorado, Interdisciplinary Telecommunications Program, filed December 12, 2011 in PS Docket 11-153 at 3, 12 (Available at http://apps.fcc.gov/ecfs/comment/view?id=6016877949). Transition to Real Time Text ("RTT") might also impact the margin of text coverage of CMS providers, given the findings of the University of Colorado.

BRETSA is aware of rural and mountainous areas of Colorado where residents who have "cut the cord" regularly communicate by text-messaging only, because there is insufficient CMS voice coverage of their residential locations. BRETSA is also aware that a number of rescues of individuals lost and/or injured in the Colorado backcountry due to their ability to communicate with family or friends by text message, who relayed the messages to public safety authorities.

On November 6, 2015, Bruce Romero, formerly Emergency Dispatch Director of the Aspen-Pitkin County Communications Center (now Executive Director of the Colorado 9-1-1 Resource Center) spoke on a panel on Text-to-911 at the Resource Center's "9-1-1 Goes to Denver" event. The Aspen-Pitkin County Communications Center was the first PSAP to implement Text-to-911 in Colorado, in October, 2013. Mr. Romero has stated that approximately 80 percent of Text-to-911 "calls" received by the Aspen-Pitkin County PSAP since implementation were from individuals who were unable to get a voice connection, including backcountry rescue situations. He stated that as of the date of the 9-1-1 Goes to Denver event, the PSAP had received only two text-to-911 calls from speech and hearing impaired individuals, even though Aspen Camp of the Deaf and Hard of Hearing is located within the jurisdiction (the Camp is not located in an area with CMS service, but individuals attending the camp also travel beyond the camp premises and throughout Aspen and Pitkin County). [4]

In response to deregulatory legislation in Colorado in 2014, which some interest groups feared would lead to loss of exchange telephone service, some witnesses testified that they are unable to make CMS voice calls from all or some areas of their urban apartments. SMS is likely also available in some of these areas of low CMS signal strength within even urban and suburban areas. Thus, while Text-to-911 is essential for the deaf and hearing-impaired community and individuals in "silent call" situations, it is also essential, *and used*, in areas where there is an insufficient CMS signal to place a voice call but SMS text messages can be sent.

As BRETSA understands it, with LTE-IMS, SMS text-messaging over CMS control channels is replaced with emulated SMS text-messaging over the same wireless broadband channel as is used for voice communications. While BRETSA has been unable to verify the extent to which the migration to LTE-IMS will affect the expanded CMS SMS coverage areas, a representative of BRETSA put the question to John Snapp of Intrado during a session at the 2013 Colorado APCO/NENA State Conference. Mr. Snapp opined that there would still be an increased margin of text messaging coverage, but it would be very slight.

Because the University of Colorado found the expanded coverage capability of SMS text messaging relate to periodic variances in field strength and the limited window of time required for an SMS message to be transmitted, it is possible that the transition to RTT would also adversely impact text-to-911 service areas.

---

[4] A video recording of the 9-1-1 Goes to Denver Panel is available at https://sites.google.com/site/co911rc/issues-summit/2015-911-goes-to-denver, Sessions, Part 1. At approximately 11:10 to 14:30 of the video, Mr. Romero and Jennifer Kirkland, Operations Support Supervisor, Vail Public Safety Communications Center, discuss receipt of Text-to-911 calls for backcountry rescue and other situations where callers cannot get a sufficient signal to make a voice call, versus Text-to-911 calls from speech and hearing-impaired individuals.

BRETSA is thus concerned that even as text-to-911 is being deployed, substantial public safety benefits of the service will be eliminated as a result of the evolution of CMS technology and systems.

BRETSA raised this issue in its Comments on the Second Further Notice of Proposed Rulemaking in PS Docket No. 11-153, available at http://apps.fcc.gov/ecfs/comment/view?id=6017611014 (last checked April 3, 2015), at 40, and the Commission requested comment on the issue by CMS providers in its *Facilitating the Deployment of Text-to-911 and Other Next Generation 9-1-1 Applications (Second Report and Order and Third Further Notice of Proposed Rulemaking in PS Docket No. 11-153)*, FCC 14-118, n. 336 at 54. Unfortunately, no CMS provider commented on the issue.

We believe it is prudent for the Commission and the 9-1-1 Community to determine whether, and the extent to which, CMS SMS coverage margins beyond the area in which voice calls can be placed will be diminished with LTE-IMS and/or RTT. If SMS coverage margins will be reduced, it would be prudent for the Commission and the 9-1-1 Community to seek solutions for the loss in 9-1-1 coverage.[5]

Given (i) the importance the Commission has rightfully placed on text-to-911, (ii) that text-to-911 is critical for even non-hearing or speech impaired individuals to reach 9-1-1 in silent call situations *or when located in areas with insufficient CMS signal strength to place a voice call*, and (iii) the potential public safety impacts of reduction in 9-1-1 coverage areas; BRETSA believes that an entity established to address technical issues should undertake to verify whether text-messaging coverage margins will be diminished as a result of the transition to LTE-IMS or RTT, and/or other changes in CMS technology, and if so to determine the extent of the diminution. If significant, the entity should explore options to address and avoid the loss of 9-1-1 coverage provided by SMS text-to-911 service.

9-1-1 Call Routing.

Most PSAPs now report that 9-1-1 calls from wireless devices now account for 70-85% of all 9-1-1 calls. In 2015, CenturyLink, successor to the former BOC Mountain Bell, reported that it was providing basic telephone service to less than 25% of the homes its facilities pass. This is significant because *wireless* 9-1-1 calls are subject to misrouting.

[5] Continuation of the offering of SMS text-messaging over "control channels" even if not required for LTE-IMS service would be one solution, if it would not interfere with the LTE-IMS service. Maintenance of a true SMS-texting capability as a 911-only emergency channel pending development of an equally robust replacement service would be improved by the ability of any wireless device to message 9-1-1 through any CMS provider's system.

As you know, in the vast majority of the country wireless calls are default-routed to a specific PSAP based upon Phase I information, the location of the CMS system antenna through which a wireless call is connected (or population centroid served by that antenna). CMS antenna coverage areas do not conform to jurisdictional boundaries, and calls connected through a CMS system antenna made from a jurisdiction other than that to which 9-1-1 calls are default routed, are misrouted. In addition, BRETSA believes that when CMS system antennas in the area of an incident are at capacity, additional subscriber calls "leapfrog" the nearest system antennas and connect through more distant sites. Thus, BRETSA PSAPs receive 9-1-1 calls from travelers on Interstate 25, even though that highway is located well beyond the jurisdictions the PSAPs serve.

When 9-1-1 calls are misrouted, significant delay in the dispatch of First Responders to the scene of an incident can, and frequently does result. In these cases, (i) the dispatcher receiving the call must determine that the call has been misrouted based on information provided by the caller, or from Phase II data if and when it becomes available, (ii) the dispatcher must identify the jurisdiction in which the caller is located and transfer the call to the PSAP for that jurisdiction (where PSAP-to-PSAP call transfer is available), and (iii) the dispatcher transferring the call, or the caller, has to provide the calltaker at the PSAP to which the call is transferred the nature and location of the emergency before First Responders can be dispatched…when every second counts.

BRETSA's Longmont PSAP reports that it receives approximately five Phase I Misroutes per dispatcher per shift, but only about one call per week from an individual who doesn't respond or doesn't know his location. Thus, while cases in which the caller is unable to provide his or her location are rather rare, Phase I Misroutes are quite common.

BRETSA is of course aware of the ongoing work in the ATIS/ESIF test bed to develop, demonstrate an ultimately deploy over a multi-year period, high-tech solutions to improve indoor wireless location accuracy pursuant to the February 3, 2015 Fourth Report and Order in PS Docket No. 07-114. It is unclear to BRETSA whether these solutions will ubiquitously resolve the issues of 9-1-1 misroutes, and whether interim measures to minimize the impact of 9-1-1 misroutes can be cost-effectively implemented given the solutions being developed in PS Docket No. 07-114 and the progress being made towards those solutions. However, the high number of incidents for which dispatch of First Responders is delayed due to Phase I Misroutes argues strongly for assessment of the ability and cost-effectiveness of measures to reduce the number and impact of such misroutes.

The starting point to assess and mitigate the effect of Phase I misroutes is the collection of data allowing statistical analysis of 9-1-1 routing accuracy for purposes of identifying and remediating misroutes. Periodic or ongoing analysis of Phase I and Phase II location data associated with calls at the CMS provider or ANI/ALI provider level

should be required to facilitate determination of the percentage of 9-1-1 misroutes produced by each site. This would in-turn facilitate selective application of responsive measures for cell sites or sectors with high percentages of misrouted calls, in consultation with affected PSAPs.

Measures which would limit the number of Phase I Misroutes, or reduce response times resulting from misroutes, include:

- **Wireless System Design.**

  Jurisdictional boundaries should be taken into account in placement and orientation of their towers and antennas, where feasible. Antennas should be aligned to minimize coverage of multiple jurisdictions.

- **Identifying Calls Which May Be Phase I Misroutes.**

  Wireless providers, working with ALI providers and PSAPs, could identify potential Phase I Misroutes by including a code in Phase I data to alert PSAPs to the percentage of calls from the antenna which are Phase I Misroutes.[6] Phase I data transmitted with a Phase I-routed call might be modified to include an indicator as to the percentage of misrouted calls received through the same cell site or antenna. This data would alert PSAPs to calls with a higher likelihood of having been misrouted to question the caller more carefully as to their location, to reduce the time required to identify and transfer misrouted calls.

- **Modifying Default Routing.**

  It is possible that 9-1-1 calls received through some CMS system sites or antennas are routed to the PSAP serving the jurisdiction in which the site or antenna is located, even though the site or antenna may receive a majority of calls from a more densely populated or developed area, or a high-volume highway, in an adjacent jurisdiction. Even though a majority of *ordinary call traffic* may originate within one jurisdiction served by a site or antenna, the presence of an industrial area or interstate highway in an adjacent jurisdiction served by the site or antenna may result in a higher number of *9-1-1 calls* being received through the site or antenna originating in the adjacent jurisdiction. A statistical analysis of 9-1-1 calls re-

[6] BRETSA is aware that Phase II location may indicate a different jurisdiction than Phase I data because the caller is in-transit. However BRETSA is not aware of what data is available, or potentially available, to CMS providers and ALI providers to determine the percentage of misroutes and assess whether location changes are due to improved resolution or movement of the caller, such as changes in the antennas through which a call is received. That is an additional reason BRETSA believes the matter should be submitted to a technical body for consideration. BRETSA also believes such considerations warrant consultation between CMS providers and affected PSAPs before informational or remedial measures are applied.

ceived through the site for each cell sector would identify situations in which default routing of 9-1-1 calls should be changed for a site.

- **Reorienting System Antennas.**

  Wireless providers should evaluate the feasibility of re-orienting antennas at sites which have a relatively high percentage of Phase I Misroutes as a means of remediation, if commercially feasible.

- **Modifying System Design.**

  We have identified above the apparent leapfrogging of 9-1-1 calls to connect through more distant system sites when sites near an incident are at capacity. In BRETSA's experience, this seems most common in the case of 9-1-1 calls from major highways, such as Interstate highways. If calls, including 9-1-1 calls, are leapfrogging past sites nearer the highway because they are at capacity, and connecting through more distant sites; CMS providers should consider modifying system capacity, and design if necessary, in areas in which call-volumes exceed system capacity. Statistical analysis of Phase I 9-1-1 call routing and Phase II Location information can identify such areas.

- **Phase II Routing.**

  Phase II Routing should be implemented for sites or antennas which have a high percentage of Phase I Misroutes as a means of remediation, at the discretion of the PSAPs affected. In Phase II Routing, routing of 9-1-1 calls to a PSAP is delayed until the Phase II data is received for accurate call routing, while a ringing signal is sent back to the caller. If a certain interval of time elapses before the Phase II data is received, the call is routed to the default PSAP based upon the Phase I location. BRETSA understands Phase II Routing has already been implemented in some areas of California and Ohio, and the technology *can thus be implemented immediately* in other areas to reduce the number of incidents for which help is delayed due to Phase I Misroutes.

  Because implementation of Phase II Routing would delay delivery of *all* 9-1-1 calls received over the tower or antenna, the PSAP(s) involved should make the determination as to whether Phase II Routing should be implemented. Reasonable public safety professionals can disagree as to the percentage of Phase I Misroutes which will justify delaying delivery of all 9-1-1 calls through a tower or antenna. These determinations will be impacted by the amount of time required for the Phase II location data to be available for call-routing.

- **Accelerate Phase II Location Determination.**

  To facilitate Phase II Routing, the Commission should promote accelerated Phase II Location Determination to facilitate Phase II Routing, which would reduce the delay in Phase II Call Routing. Time-to-First-Fix ("TTFF") as well as location accuracy is critical criteria for acceptability of location technologies.

  BRETSA notes that in the CSRIC III WG3 Bay Area Indoor Location Tests, the minimum time at which location accuracy was measured was 30 seconds. As a result, technology vendors participating in the tests delayed location reporting until the 30-second limit was reached, to maximize the accuracy of the locations reported using their respective technologies. Location technology vendors, including vendors which participated in the CSRIC III tests, have claimed TTFF of less than 10 seconds, and as little as 4-to 6 seconds. The faster the TTFF, the shorter the delay in routing all calls, including calls which would be Phase I default-routed to the correct PSAP, as a result of Phase II routing. However the CSRIC III tests did not verify whether the various location technologies are actually capable of delivering TTFFs of 6-seconds or less, because the tests were oriented more towards location accuracy than TTFF. TTFF is more important for *call routing* than sub-150 meter accuracy, or even sub-300 meter accuracy. (Phase II routing with even 300 meter accuracy would place callers in the correct jurisdiction much more frequently than Phase I default routing based upon the location of a tower or antenna serving multiple jurisdictions.)

  Because Phase II Routing has actually been implemented in some areas of the country, the Commission should be able to gather information regarding its effectiveness, and actual Phase II Routing delays, with minimal effort and expense. The Phase II Routing implementations may also provide an inexpensive, ready-built test bed for evaluating TTFF performance of various Phase II location technologies.

- **"Phase III Routing," Using More Granular Location Information Than Phase I Data And Which Is More Rapidly Available Than Phase II Data, Should Be Explored.**

  Wireless calls are routed based on Phase I data because of the delay, or historical delay, in receipt of Phase II data. Phase I Misroutes occur frequently because Phase I data is not sufficiently granular. That is, the address of the CMRS tower site used to route all calls made in the tower's coverage area. Phase I routing information is the least granular location data available. BRETSA has suggested that a third category of location information, which BRETSA has termed Phase III location information, might be implemented for 9-1-1 call-routing purposes. Phase III data would be available more quickly than Phase II data so that it could

be used for routing purposes, and provide more granular location information than Phase I data, to minimize the incidence of Phase I Misroutes.

A number of location technologies have been identified in Docket No. 07-114, and others may yet be introduced, which may not be accurate enough to meet the Commission's goals for indoor location accuracy, but which may offer a combination of improved accuracy over Phase I data and a very fast TTFF to get the call to the correct PSAP; while delivery of highly precise Phase II data may still require additional time to acquire, process and deliver to the PSAP. Such technologies would meet the meet the goals of Phase III Routing. This would get the call to the correct PSAP and allow the calltaker to determine the nature and location of the emergency and dispatch First Responders. The information might be specifically accurate to identify the complement of First Responder agencies with responsibility for responding to the caller's location, enabling the dispatch of First Responders even if the caller could not provide his location (in this event, the First Responders could be dispatched to the general location of the caller, and the caller's location updated when more precise Phase II information was received).

BRETSA also recognizes that a Phase II solution may be developed which will reliably provide highly accurate outdoor and indoor location data quickly enough for use in call routing as to eliminate the need for Phase III data. However, because Emergency Response is delayed *by minutes* due to Phase I Misroutes in exponentially more cases than those in which the caller cannot provide his location, the potential for Phase III Routing should be considered. The technical organization or office should of course include in any assessment the capabilities and deployment timelines of location technologies being developed and demonstrated in the ATIS/ESIF test bed, and the cost and time required for deployment potential Phase III location technologies.

- **Automating Requests For Additional Location Information.**

  As discussed above with respect to Locate Requests for non-911 Callers, solutions for CMS providers to expedite Locate Services and provide additional information regarding device-users might also benefit PSAPs seeking to locate individuals calling 9-1-1, and verify appropriate routing of 9-1-1 calls, depending upon the extent to which Locate Service might be expedited.

Conclusion

Each of the issues and concerns discussed above, and potential solutions, are raised by BRETSA based upon the real-world experiences and the challenges faced by PSAPs daily. These issues require technical information and analysis, knowledge of the capabilities of CMS provider systems, and cost-benefit analyses which are not generally

available to public safety agencies and PSAPs. BRETSA respectfully requests the Public Safety and Homeland Security Bureau refer these issues and concerns to CSRIC, OET, or another appropriate entity for consideration.

Very truly yours,

Joseph P. Benkert

Counsel to the Boulder Emergency
Telephone Service Authority

Suicide by Semi
February 27, 2013 4:27PM MST
Transcript

Time (Tape)	Party	Audio
00:02	**Longmont 9-1-1:**	9-1-1. What is the address of your emergency
00:05	**Caller:**	Okay, my friend, a friend of mine just called me and told me he was going to kill himself and I ….
00:10	**Longmont 9-1-1:**	Okay. Where is your friend at?
00:13	**Caller:**	I don't know. He hung up on me and said he's somewhere on I-25 and he was going to step in front of a semi. And he hung up on me. I don't know if you can put a trace on his phone.
00:21	**Longmont 9-1-1:**	What is your name sir? Sir, what is your name?
00:24	**Caller:**	Aaron -------- [Last name omitted for privacy reasons].
00:26	**Longmont 9-1-1:**	----------? [Last name spelled; omitted for privacy reasons]
00:26	**Caller:**	Yes.
00:27	**Longmont 9-1-1:**	Aaron what's the cellphone number you're calling me from please?
00:30	**Caller:**	303-656-------.
00:38	**Longmont 9-1-1:**	One more time for me.
00:41	**Caller:**	303-656-----.
00:47	**Longmont 9-1-1:**	Okay. And what's your friend's name?
00:50	**Caller:**	Josh, his name is Josh.
00:051	**Longmont 9-1-1:**	And his last name please?
00:54	**Caller:**	Oh God, um ------, Josh ------ [Last name omitted for privacy reasons].
00:56	**Longmont 9-1-1:**	And how old is Josh?
00:59	**Caller:**	27.
01:03	**Longmont 9-1-1:**	And so he called you on your phone, on your cellphone, stated that he was going to kill himself.

01:08	**Caller:**	Yeah, he gave me his parents' phone number and told me to call them, and tell them he loved them.
01:14	**Longmont 9-1-1:**	By stepping in front of a semi?
01:17	**Caller:**	Yes, Yeah, that's what he told me.
01:20	**Longmont 9-1-1:**	Okay. And where did he say he was? Other than I-25?
01:24	**Caller:**	Um, that's all he said. He said he was on the Interstate. I asked him like eight times, he wouldn't tell me.
01:30	**Longmont 9-1-1:**	So he didn't say I-25.
01:32	**Caller:**	No, he said the Interstate. That's all I know.
01:34	**Longmont 9-1-1:**	Okay. We've got a couple of Interstates, so…
01:39	**Caller:**	Yeah, he he drives, um, God Oh God, I think it's a Jeep Cherokee, it's a silver he said, he told me he was pulling over on the Interstate and he lives in Aurora, so, um, I'm kind of assuming it's I-25.
01:53	**Longmont 9-1-1:**	Okay, what kind of a vehicle is it? You said a Jeep?
01:58	**Caller:**	Yeah, I think it's a Jeep Grand Cherokee. I'm pretty sure it's a Cherokee, but um.
02:00	**Longmont 9-1-1:**	What color is it?
02:02	**Caller:**	It's silver.
02:11	**Longmont 9-1-1:**	Okay. What is your home address, sir?
02:16	**Caller:**	---------- [Street address omitted for privacy reasons] Street, Lyons Colorado
02:20	**Longmont 9-1-1:**	---------- [Street address omitted for privacy reasons] Street?
02:22	**Caller:**	Well actually no no never mind I'm sorry I don't live there anymore. I can't think straight right now it's um…
02:26	**Longmont 9-1-1:**	That's okay.
02:26	**Caller:**	---- it's --------- [Street address omitted for privacy reasons] Drive.
02:33	**Longmont 9-1-1:**	Okay. And what's your friend's phone number please.?
02:38	**Caller:**	Okay, it's

02:40	**Longmont 9-1-1:**	What is your Friend's Phone number?
02:42	**Caller:**	I thought I...Didn't I already say it?
02:43	**Longmont 9-1-1:**	No Sir You didn't
02:44	**Caller:**	303
02:44	**Longmont 9-1-1:**	Is that the 303 656-----?
02:47	**Caller:**	Yeah Yeah
02:48	**Longmont 9-1-1:**	I'm sorry, I was asking for your phone number when I got that Hang on one second
02:51	**Caller:**	Oh, I'm sorry. Yeah, that's his.
02:53	**Longmont 9-1-1:**	Alright. That's okay. Your phone number then?
02:56	**Caller:**	720-371-----]
03:05	**Longmont 9-1-1:**	Okay, Um , we will see what we can do, okay?
03:08	**Caller:**	Okay.
03:09	**Longmont 9-1-1:**	Alright, and, uh, I'll have an officer contact you?
03:12	**Caller:**	Okay
03:12	**Longmont 9-1-1:**	Alright, thank you sir for calling. okay, as soon as we have um, I'll have an officer call you as well, okay?
03:20	**Longmont 9-1-1:**	Do you know who his cellphone carrier is.? That will save me some time.
03:24	**Caller:**	Um, oh God, Um, it's, um, it's Verizon it's Verizon.
03:29	**Longmont 9-1-1:**	It is Verizon?
03:30	**Caller:**	It is Verizon.
03:35	**Longmont 9-1-1:**	Alright, and I'll have someone call you, okay? and we'll start tracing this as soon as we can. Did he mention, he just said he was going to throw himself in front of a vehicle, ah excuse me, a semi, am I correct?
03:44	**Caller:**	Yeah, that's what he said.
03:45	**Longmont 9-1-1:**	Okay

03:45	**Caller:**	He wouldn't tell me where he was.
03:47	**Longmont 9-1-1:**	Alright, Not a problem. We'll go ahead and get on this. Okay?
03:51	**Caller:**	Okay.
03:51	**Longmont 9-1-1:**	Thank you sir.
03:53	**Caller:**	Yeah.
03:54	**Longmont 9-1-1:**	Bye.
03:54	**[Disconnected]**	
04:01	**[Dialtone/Dialing]**	
04:10	**Verizon:**	You've reached the Verizon Wireless Law Enforcement Team
04:14	**[Ringing]**	
04:31	**Verizon:**	Hi this is Doug with Verizon Wireless Legal. Can I have your name and agency please?
04:35	**Longmont 9-1-1:**	Hi Josh my name is Christine Mason I'm with the Longmont Police Department.
04:42	**Verizon:**	You're with...I'm Sorry, what PD is it?
04:44	**Longmont 9-1-1:**	Longmont L-o-n-g-m-o-n-t Colorado
04:49	**Verizon:**	How can I help you today?
04:51	**Longmont 9-1-1:**	I'm calling to report um we just received a 9-1-1 call from a male party stating that his friend just called him stating that he wanted to throw himself in front of a semi and was on the Interstate on his cellphone.
05:05	**Verizon:**	Okay. What's the ah target telephone number?
05:08	**Longmont 9-1-1:**	303-656--- I'm sorry correction ----.
05:18	**Verizon:**	And what's the call back verification number for you?
05:20	**Longmont 9-1-1:**	303-651-8501.
05:27	**Verizon:**	And do you have one of our emergency information request forms?
05:30	**Longmont 9-1-1:**	I probably do.

05:32	**Verizon:**	Okay. I'll put you on a brief hold while I while I get the information okay. You're looking for location information, correct?
05:37	**Longmont 9-1-1:**	Yes sir, I am.
05:39	**Verizon:**	[Unintelligible.]
05:40	**Longmont 9-1-1:**	Thank you.
	[Background PSAP Noise as 9-1-1 Operator Searches through public records for additional information on the reported suicidal person.]	
09:16	**Longmont 9-1-1:**	Oh, Looky here. I found the guy.
10:08	**Longmont 9-1-1:**	[To someone in PSAP:] Sorry, I'm...I'm on hold.
10:26	**Verizon:**	Okay Ma'am. Thank you for holding.
10:29	**Longmont 9-1-1:**	No problem.
10:31	**Verizon:**	Hello.
10:32	**Longmont 9-1-1:**	Yeah. I'm here.
10:33	**Verizon:**	Okay, it looks like the last activity I have is at 16:10 today. It looks like he hit
10:38	**Longmont 9-1-1:**	Yes, that would be arou...
10:42	**Verizon:**	I'm sorry.
10:42	**Longmont 9-1-1:**	That would be it.
10:44	**Verizon:**	Uh, yeah. 1610 was the last time I have.
10:48	**Longmont 9-1-1:**	okay.
10:48	**Verizon:**	He hit cell tower number ah 589, which is located on 3855 Lewiston street in Aurora.
10:58	**Longmont 9-1-1:**	Can you spell that for me?

10:59	**Verizon:**	It looks like...sure L-e-w--i-s-t-o-n. Street in Aurora. Ah, looks like he was approximately .91 miles away from that particular location ah it looks like he was he hit sector 1 on the tower the center of that sector is at 350 degrees which would put him in the a I would say a north-northwest direction but plus or minus 60 degrees for the full width of the sector. Now the round trip delay measurement which is not which is not related to a GPS measurement but produces a call latitude and longitude of solely off the call signal [Unintelligible]. That latitude is, is 39.77221
11:44	**Longmont 9-1-1:**	One more time with that latitude 39.
11:46	**Verizon:**	Yep. point 77221
11:50	**Longmont 9-1-1:**	And the lat..I mean the…
11:51	**Verizon:**	and the longitude is negative ah negative 104.81809, and that should correlate with the distance.
12:02	**Longmont 9-1-1:**	Alright, thank you. I really appreciate it and I'll fill that out and get it back to you.
12:08	**Verizon:**	Okay, thank you.
12:08	**Longmont 9-1-1:**	Uh, can you just fax one over to me just in case
12:11	**Verizon:**	Sure, what's your fax number?
12:13	**Longmont 9-1-1:**	303-651-8972.
12:18	**Verizon:**	Okay, I'll send it right over.
12:20	**Longmont 9-1-1:**	Thank you sir. I really appreciate your time.
12:21	**Verizon:**	No problem.
12:22	**Longmont 9-1-1:**	Bye.
12:22	**Verizon:**	Yep, no problem.
12:25	**[Disconnected]**	
12:31	**[Dial Tone/Ringing]**	
12:43	**Aurora 9-1-1:**	Aurora Dispatch [Unintelligible]. Do you have an emergency?
12:46	**Longmont 9-1-1:**	Ah.

12:47	**Aurora 9-1-1:**	Hello.
12:48	**Longmont 9-1-1:**	Hi. My name is Christine with Longmont Police and Fire Department I'm calling to report a possible suicidal party.
12:55	**Aurora 9-1-1:**	Okay, where at?
12:55	**Longmont 9-1-1:**	Ah, to be honest with you, I did this off of the cellphone ping with Verizon wireless. I have a lat long. But I don't have a physical address. I do have the gentleman's physical address I obtained off the QDA from CBI. Here's how it went down. I received a 9-1-1 phone call from a Aaron ----- who resides at ---------- Drive in Longmont.
13:25	**Aurora 9-1-1:**	---- [Street number omitted for privacy reasons]
13:27	**Longmont 9-1-1:**	----- one word --- [Street omitted for privacy reasons]
13:29	**Aurora 9-1-1:**	Alright. I have multiple things going on and I may have to throw you on hold because I'm also on fire. That's ---- and that's north or south -----?
13:36	**Longmont 9-1-1:**	There is no north or south, it's just ----- Drive, in Longmont.
13:40	**Aurora 9-1-1:**	Got it. Okay. In Longmont. Okay.
13:42	**Longmont 9-1-1:**	Aaron's phone number is 720-371------
13:51	**Aurora 9-1-1:**	Okay.
13:51	**Longmont 9-1-1:**	States his friend Josh ----- [Last name omitted for privacy reasons], 27 year-old male phoned from 303-656----- stating that he was in his silver jeep, was going to pull over on the Interstate and commit suicide by stepping in front of a semi.
14:16	**Aurora 9-1-1:**	We just had somebody step in front of a vehicle less than 2 minutes ago.
14:19	**Longmont 9-1-1:**	Are you kidding me?
14:20	**Aurora 9-1-1:**	A silver chief was pulled off and stepped in front of a semi.
14:24	**Longmont 9-1-1:**	Yeah, I've got a license plate on the vehicle that I obtained off the QDA of ---------. [To someone else in Longmont PSAP: “He did it.]
14:31	**Aurora 9-1-1:**	---------. Okay.
14:32	**Longmont 9-1-1:**	Yep.
14:32	**Aurora 9-1-1:**	Okay

14:33	**Longmont 9-1-1:**	And I have..
14:35	**Aurora 9-1-1:**	Is that correct?
14:38	**Aurora 9-1-1:**	I'm sorry.
14:39	**Longmont 9-1-1:**	That's what I obtained off of the QDA. [Background: “Her suicide did it.”]
14:44	**Aurora 9-1-1:**	Okay. I'm double checking it because I'm betting your 9-1-1 ...
14:47	**Longmont 9-1-1:**	Yeah, I've got an address...
14:48	**Aurora 9-1-1:**	got hit by a tractor trailer, okay
14:51	**Aurora 9-1-1:**	Alright, what's the address you've got?
14:54	**Longmont 9-1-1:**	I have an address off the lat. long.
14:57	**Aurora 9-1-1:**	Uh hum
14:58	**Longmont 9-1-1:**	of 39.77221 longitude negative 104.818
15:10	**Aurora 9-1-1:**	point 818
15:12	**Longmont 9-1-1:**	09
15:14	**Aurora 9-1-1:**	09
15:15	**Longmont 9-1-1:**	The gentleman at Verizon said he was .19 miles away from ah a cell tower at 3855 Lewiston, and it should be in a north-northeast direction.
15:32	**Aurora 9-1-1:**	Pretty close to where we're ... okay.
15:35	**Longmont 9-1-1:**	The gentleman's name ah on the QDA. ah, his address is ------- [Street address omitted for privacy reasons] Avenue.
15:46	**Aurora 9-1-1:**	Okay, give me just a second here. Hold on.
15:47	**Longmont 9-1-1:**	No worries.
15:54	**Aurora 9-1-1:**	Okay.
16:08	**Aurora 9-1-1:**	Okay.
16:14	**Aurora 9-1-1:**	Yeah. [Unintelligible] real quick, I don't know if this is his home or not. Sorry, I'm grabbing another dispatcher here.

16:21	**Longmont 9-1-1:**	You're fine. It's particularly okay. I totally understand.
16:25	**Aurora 9-1-1:**	Um…hold on, I'm trying to pull up an actual address…
16:31	**Longmont 9-1-1:**	You're fine. No worries.
16:47	**Aurora 9-1-1:**	Yeah, well I'm fairly certain that's the same one because it is only about a quarter mile away.
16:53	**Longmont 9-1-1:**	Yeah, he, there's no coincidence like that.
16:56	**Aurora 9-1-1:**	Yeah. [Unintelligible]
16:59	**Longmont 9-1-1:**	Absolutely.
16:59	**Aurora 9-1-1:**	[Unintelligible]
17:01	**Longmont 9-1-1:**	Yep, I know.
17:02	**Aurora 9-1-1:**	So....hold on
17:04	**Aurora 9-1-1:**	[Unintelligible] Let me check with my PD dispatcher and see if this vehicle matches up okay?
18:03	**Longmont 9-1-1:**	You're fine.
18:40	**Aurora 9-1-1:**	Okay, and what was your name again?
18:42	**Longmont 9-1-1:**	My name is, ah, Christine Mason.
18:46	**Aurora 9-1-1:**	Christine, okay and a call back number there if I find I need you guys.
18:49	**Longmont 9-1-1:**	Longmont PD, 303-651-8501.
18:55	**Aurora 9-1-1:**	8501. okay. okay, they're not able to tell me yet but, ah, we've got both on the scene responded to so we'll go ahead and a I guess we'll let you know.
19:13	**Longmont 9-1-1:**	If you guys need a tapes request let me know, okay?
19:17	**Aurora 9-1-1:**	Okay, and a just my other question here. is, a was there anything else that they gave you, or any thing like that?
19:22	**Longmont 9-1-1:**	He didn't give me any other information.
19:25	**Aurora 9-1-1:**	Okay, except the lat long. Okay. I appreciate it. so much
19:28	**Longmont 9-1-1:**	Not a problem. uh hum. Goodbye.

19:30	**Aurora 9-1-1:**	Alright. Goodbye.
19:31	**[Disconnected]**	
	[Portion of Recording Not Related to Suicide Deleted]	
20:44	**Longmont 9-1-1:**	This is Christine.
20:46	**Caller:**	Hi, are you the one that I talked to earlier?
20:48	**Longmont 9-1-1:**	Is this Aaron?
20:49	**Caller:**	Yes.
20:50	**Longmont 9-1-1:**	Hi Aaron. I did speak with you earlier. How can I help you?
20:55	**Caller:**	Um, ah , I think he did it.
20:57	**Longmont 9-1-1:**	Okay. What makes you think he did it?
21:00	**Caller:**	He called me, and he told me that he was going to step in front of a semi truck, and then I could hear the cars in the background, and he said he was on the Interstate, and then
21:08	**Longmont 9-1-1:**	Um hum.
21:08	**Caller:**	Uh, it just went dead. And now when I call his phone, all I hear, is just, two beeps.
21:14	**Longmont 9-1-1:**	Okay.
21:14	**Caller:**	and a long beep.
21:15	**Longmont 9-1-1:**	Alright.
21:16	**Caller:**	and
21:18	**Longmont 9-1-1:**	Aaron, here's what I've done so far. I contacted Verizon ah security and obtained a ping for his cell phone. I was able to um I was able to secure a lat long on his cellphone from where it was at, and it shows that it's still in Aurora Colorado. Um, what I will do, is transfer you over to Aurora, I have already contacted them to let them know the situation, and they may be have further information that they're able to provide you at this time. okay?

21:50	**Caller:**	Okay.
21:51	**Longmont 9-1-1:**	If I lose you, please call me back on 9-1-1 and I'll stay on the line with you until I get you transferred. Okay?
21:57	**Caller:**	Okay. I, ah I just want to know something.
22:00	**Longmont 9-1-1:**	Sure, I understand. It may be a little bit of time, sir, before you can, ah, know anything. Okay?
22:07	**Caller:**	Okay.
22:07	**Longmont 9-1-1:**	Do you understand what I'm saying?
22:09	**Caller:**	Yeah, I do. I'm, I'm, I, I just don't know what to think right now.
22:13	**Longmont 9-1-1:**	Okay. Is there anybody with you?
22:16	**Caller:**	Um, yeah, I got a friend.
22:18	**Longmont 9-1-1:**	Okay. Alright. If you'll hold for just a moment sir, I will transfer you.
22:22	**Caller:**	Okay.
22:23	**Longmont 9-1-1:**	Thank you for your patience.
22:31	**[Ringing]**	
22:39	**[End of recording]**	