

I believe location is the most important item to know when a 9-1-1 call is received. I also agree with APCO International that accuracy testing should be done at the PSAP level. In our case (Lancaster County, Pennsylvania) the county is the area of our PSAP. I also believe standards should be the same regardless of the technology. I would recommend the Phase II standard of 50 meters for 67 percent of the calls and 150 meters for 95 percent of the calls for handset-based technologies be used for all devices at the PSAP level.

I believe deferring enforcement of accuracy standards should not occur for wireline and wireless technologies because I believe they can be met today. Other technology standards are not as well defined and I would agree with a deferring of enforcement of accuracy standards for VoIP 9-1-1 calls and other newer technologies until a future date to be determined by the FCC in conjunction with organizations like APCO International and NENA.

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