

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Wireless E911 Location Accuracy Requirements	)	PS Docket No. 07-114
	)	
Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems	)	CC Docket No. 94-102
	)	
Association of Public-Safety Communications Officials-International, Inc. Request for Declaratory Ruling	)	
	)	
911 Requirements for IP-Enabled Service Providers	)	WC Docket No. 05-196
	)	
To: The Commission		

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following comments in response to Section III.A of the Commission’s *Notice of Proposed Rulemaking*, FCC 07-108 (released June 1, 2007) (“*NPRM*”), in the above-captioned proceedings.<sup>1</sup>

APCO was established in 1935 and is the nation’s oldest and largest public safety communications organization, representing its approximately 16,000 members who manage and operate communications systems and facilities for police, fire, emergency medical and other state

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<sup>1</sup> The *NPRM* established separate comment periods for Section III.A and Section III.B.

and local government public safety agencies. For two decades, APCO has been at the forefront of efforts to provide comprehensive and accurate Enhanced 9-1-1 (“E9-1-1”) capability for wireless telephone devices. APCO’s mission is to be a member driven association of communications professionals that provides leadership; influences public safety communications decisions of government and industry; promotes professional development; and, fosters the development and use of technology for the benefit of the public.

On October 6, 2004, APCO filed a Request for Declaratory Ruling asking the Commission to clarify that the relevant area for measuring compliance with Section 20.18(h) is the Public Safety Answering Point (“PSAP”) service area. In the absence of explicit FCC rules, wireless carriers had considered the relevant compliance area to be states (or even national service areas). Thus, wireless carriers had assumed that they can average the location accuracy of 9-1-1 calls over vast geographic areas, potentially resulting in vast differences in the location accuracy delivered to PSAPs within each state. Yet, *each* PSAP needs accurate location information for *its* incoming wireless 9-1-1 calls to deliver effective emergency services to *its* local citizens.

APCO obviously strongly supports the Commission’s tentative conclusion to grant its long-pending Request for Declaratory Ruling and to clarify that wireless carriers are required to satisfy the Enhanced 9-1-1 (“E9-1-1”) rules within each PSAP service area. As discussed in the *NPRM*, the record already describes the benefits of this clarification, which is consistent with the original intent of the rule. The purpose of Section 20.18 is to ensure that PSAPs receive accurate location information so they can dispatch first responders accurately and effectively to save lives

and property. Unfortunately, a variety of factors, including the lack of clarity in the Commission's rules, has led to substantial variation in the level of accuracy provided to PSAPs in different geographic/demographic areas from different carriers. In too many situations, the level of accuracy provided is virtually useless or far less than public (and PSAP) expectations. APCO recently submitted a study to the Commission documenting such variations and discussing the impact to public safety.<sup>2</sup>

Accurate location information for wireless 9-1-1 calls is even more important today than it was 34 months ago when APCO filed its Request for Declaratory Ruling. Today, the majority of 9-1-1 calls to many (and perhaps most) PSAPs are from wireless telephones. That is not surprising since, as noted by the Commission,

wireless services have advanced to the point where many people rely on them for communications wherever they may be, whether at home or in the workplace, indoors or outdoors, or in an urban, suburban or rural area. Many people rely on wireless phones in place of wired landline phones.<sup>3</sup>

These developments place even greater importance on accurate 9-1-1 location information being transmitted to the PSAP. Unlike wireline calls, wireless calls are not transmitted with exact street addresses, so PSAP call-takers must ascertain precise location information from the caller. At best, that causes delay. At worse, it leaves the call-taker in the dark if the caller is unable to describe their location. Examples are numerous, and include callers in emotional or medical distress, hostage situations, poor wireless connections, language barriers, or simply because the

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<sup>2</sup> Association of Public-Safety Communications Officials-International, "An Assessment of the Value of Location Data Delivered to PSAPs with Enhanced 9-1-1 Calls," CC Docket NO. 94-102 (filed Apr. 10, 2007).

<sup>3</sup> *NPRM* at ¶9.

caller does not know their exact location (a common issue with vehicle accidents, travelers, lost hikers, etc.).

The increasing number of wireless 9-1-1 calls from inside apartments, college dormitories, and houses in dense residential developments are of particular concern as there is unlikely to be a visual clue for first responders arriving at the scene (unlike an automobile accident). Therefore, depending upon the accuracy of the location information, first responders may need to search just a couple dwellings *or the entire neighborhood or multi-residence building complex, causing life-threatening delays.*

Therefore, the Commission should proceed to clarify that PSAP services areas are the relevant area for measuring compliance with Section 20.18(h).

The Commission also tentatively concludes in Section III.A of the *NPRM* that it should defer enforcement of Section 20.18(h) at the PSAP level until it completes the second phase of this proceeding (*i.e.*, issues in Section III.B of the *NPRM*). APCO concurs with that tentative conclusion. The Commission should first clarify that the relevant area for compliance is the PSAP, and then evaluate other aspects of Section 20.18 to determine if changes are needed to adopt a firm, but fair path towards more accurate, and more consistently accurate, location information for wireless 9-1-1 calls. APCO looks forward to participating in the next phase of this proceeding.

## CONCLUSION

Therefore, for the reasons set forth above and in the record of the above-referenced proceedings, the Commission should grant APCO's Request for Declaratory Ruling and clarify that PSAP service areas are the relevant area of compliance for Section 20.18(h).

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY  
COMMUNICATIONS OFFICIALS-  
INTERNATIONAL, INC.

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