

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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

**COMMENTS OF THE  
INDEPENDENT TELEPHONE AND TELECOMMUNICATIONS ALLIANCE**

To the Commission:

The Independent Telephone and Telecommunications Alliance (ITTA) hereby comments in the above-captioned proceedings. Responding to the Notice of Proposed Rulemaking (NPRM) released in these dockets on June 1, 2007,<sup>1</sup> ITTA supports the Commission's tentative conclusion to require wireless licensees to satisfy E911 Phase II location accuracy and reliability requirements at geographic levels defined by the coverage area of respective Public Safety Answering Points (PSAPs).

Wireless licensees are required to provide E911 service when a local PSAP that meets certain requirements requests such service.<sup>2</sup> The accuracy and reliability

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<sup>1</sup> Notice of Proposed Rulemaking, FCC 07-108.

<sup>2</sup> 47 CFR 20.18(f), (j).

requirements define the percentage of 911 calls that must meet defined targets of “locational” accuracy.<sup>3</sup> In April 2000, the Commission’s Office of Engineering and Technology (OET) provided guidelines wireless licensees could use to establish compliance with Automatic Location Information (ALI) requirements.<sup>4</sup> Although these standards are not mandatory, the Commission stated that compliance with the guidelines would create a “strong presumption” that the licensee complies with applicable rules.<sup>5</sup>

An open question left by these guidelines, however, was the geographic area within which compliance was measured. In the absence of specific geographic ranges, wireless licensees could average areas in which compliance had been achieved against areas in which adequate E911 service was not provided. In October 2004, the Association of Public-Safety Communications Officials-International, Inc. (APCO) filed a petition for declaratory ruling, asking the Commission to clarify the geographic area within which compliance would be measured, and suggested subsequently that either

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<sup>3</sup> 47 CFR 20.18(h): “(1) For network-based technologies: 100 meters for 67 percent of calls, 300 meters for 95 percent of calls; (2) For handset-based technologies: 50 meters for 67 percent of calls, 150 meters for 95 percent of calls. (3) For the remaining 5 percent of calls, location attempts must be made and a location estimate must be provided to the appropriate PSAP.”

<sup>4</sup> OET Bulletin No. 71, Guidelines for Testing and Verifying the Accuracy of Wireless E911 Location Systems (Apr. 12, 2000) at 2, *available at* [http://www.fcc.gov/Bureaus/Engineering\\_Technology/Documents/bulletins/oet71/oet71.pdf](http://www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet71/oet71.pdf).

<sup>5</sup> *Id.*

metropolitan statistical areas (MSAs) and rural statistical areas (RSAs) could serve as appropriate areas.<sup>6</sup>

The Commission, in the NPRM, concluded tentatively that PSAP coverage areas are the most appropriate measures for location and accuracy requirements. ITTA agrees with that position, and the Commission's observation that, "Measuring and testing location accuracy over geographic areas larger than PSAP service areas would appear to be directly contrary to the interests of public safety and homeland security."<sup>7</sup> The practice of averaging could result in a carrier achieving "compliance" when providing E911 service in one segment of a large service area, but not providing adequate service in another region. This result is contrary to the goal to provide E911 service throughout service areas. As the Commission noted, "the public interest demands that carriers and technology providers strive to ensure that when wireless callers dial 911, emergency responders are provided with location information that enables them to reach the site of the emergency as quickly as possible."<sup>8</sup> Claiming compliance based on wide averages would be in conflict with that principle.

ITTA submits that the Commission's approach to require PSAP-based compliance is reasonable, supports the public interest, and is consistent with the requirement that wireless carriers must provide E911 service upon request by the PSAP.

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<sup>6</sup> See Association of Public-Safety Communications Officials-International, Inc. Request for Declaratory Ruling, CC Docket No. 94-102, at 1 (filed Oct. 6, 2004); and, Supplement to Request for Declaratory Ruling, at 3, 4 (filed Feb. 5, 2005).

<sup>7</sup> NPRM at para. 5.

<sup>8</sup> NPRM at para. 6.

Accordingly, ITTA supports the Commission's tentative conclusion that E911 Phase II location accuracy and reliability compliance be defined by satisfaction of applicable requirements at the PSAP-defined geographic level.

Respectfully submitted,

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