WIRELESS E911 LOCATION ACCURACY REQUIREMENTS

Presentation to

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Office of Commissioner Jonathan Adelstein

CTIA – The Wireless Association®

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Wireless Industry E911 Deployment

CTIA
The Wireless Association®

- The wireless industry has made significant progress deploying advanced E911 services to the nation's 241 million wireless subscribers.
  - This progress has been achieved over time, through the close collaboration of wireless carriers, vendors and first responders.
- The FCC must be cognizant that no telecommunications service can offer perfect E911 service to all consumers.
- The FCC has previously recognized the inherent difficulties and challenges of providing wireless E911 service.
  - Laws of physics
  - Reflected in Rule 20.18(h) not requiring 100% location accuracy
  - FCC deferral to prescribe a specific accuracy testing methodology

Bifurcated NPRM Issues for Comment

- Part III.A. (Initial Comment Cycle; Comments filed 7/5/07, Reply Comments filed 7/11/07).
  - PSAP-Level Compliance with Sec. 20.18(h)
  - Deferral of Enforcement

- Part III.B. (Second Comment Cycle; Comments filed 8/20/07, Reply Comments yet to be filed 9/18/07).
  - Duration of Enforcement Deferral
  - Accuracy Standard
  - Location Technologies
  - Compliance Testing
  - Roaming
  - Application to Interconnected VoIP
  - Specific Information for FCC Reports

The FCC Must Provide an Achievable Timeframe for Developing and Implementing Any New Standard

- While CTIA, in all of its comments to date in the bifurcated NPRM, has supported the FCC's efforts to improve location accuracy, CTIA is concerned that the FCC may adopt **a date for the effectiveness** of PSAP level compliance before a full record is established.
  - Part III.B. of the bifurcated NPRM – addressing deferral of compliance with a new standard and numerous implementation and technical questions – has not yet been completed.
- Any Order establishing an effective date for compliance with a new E911 requirement before building a complete record that will inform relevant issues concerning a new accuracy standard and implementation period would be premature.
- There is no record support addressing the technical feasibility of carrier compliance with a PSAP level location accuracy standard. Indeed, the record reveals that carriers could not comply with a PSAP level accuracy standard today or likely in the near future.

The Record Supports Proceeding Cautiously

- Efforts to improve location technology will require a reasonable amount of time for development of standards, equipment, testing and deployment given the large CMRS customer base and location solutions already deployed in the marketplace.
  - Even public safety organizations recognize the need to proceed only after collecting and evaluating relevant and "technically feasible" information.

    - "… without further information regarding state-of-the-art technology, and a fair review of concerns raised by the wireless carriers and others, it is difficult at this time to propose a specific [compliance] timeframe." Comments of APCO, 8/20/07.

    - "We hope to become better educated by the answers provided in this proceeding, but at this point the answers to timing and benchmarking cannot be given with precision." Comments of NENA, 8/20/07.

- Adopting technical standards without fully vetting problems related to new standards, timeframes and testing may have unintended consequences that could degrade E911 access.
  - Small and rural carriers could be forced to discontinue service instead of complying with the new rules. *See, e.g.*, Rural Cellular Association Comments and Reply Comments, SouthernLINC Wireless Reply Comments.

Technical and Implementation Issues Must Be Identified and Resolved Prior to Any New E911 Standard

- The overwhelming majority of commenters support a forum involving technical experts from all parts of the industry, Public Safety and FCC to evaluate feasible solutions and report to the Commission.
  - Create an E911 working group modeled after the WARN Act CMSAAC.
  - Assemble various industry representatives to collaborate to create workable standards and rules.
  - Can be held accountable to FCC to report progress on a specified schedule.

- The E911 working group would be the most appropriate forum for addressing requirements for location accuracy standards, including whether a single location accuracy standard might be appropriate, compliance timeframes and compliance testing.

Technical and Implementation Issues Must Be Identified and Resolved Prior to Any New E911 Standard (cont'd)

- A forum tasked with studying and developing solutions is supported by wireless carriers, equipment manufacturers, and Public Safety:
  - Commenters supporting a forum include Texas Instruments, Motorola, Nokia, Intrado, TIA, Qualcomm, ATIS, Andrew Corp., Polaris Wireless, CTIA – The Wireless Association®, RCA, NTCA, SunCom Wireless, SouthernLINC, Sprint Nextel, RTG, AT&T, T-Mobile, Verizon Wireless, Texas 9-1-1 Alliance, 911 Industry Alliance, NENA and APCO.
  - No commenter opposed this proposal.
  - "Moreover, there is insufficient information available today to determine what higher level of location accuracy is achievable, and when. Thus, Motorola encourages the Commission to create an industry working group to study this issue and develop recommendations regarding what this new standard should require." Comments of Motorola, 8/20/07.
  - "The Texas 9-1-1 Agencies urge the Commission to convene or support technology forums to develop more specific details to improve wireless location accuracy." Comments of The Texas 9-1-1 Alliance, 8/20/07.

Going Forward

- CTIA supports and stands ready to facilitate a WARN Act-type E911 working group.