

RCA's E911 Location Accuracy Exemption and Waiver Policy

For all carriers with less than 1 million subscribers, and all carriers using network-only or blended network and A-GPS measurements that provide service in a county that has less than 3 cell sites, the FCC should exempt from compliance with the new E911 location accuracy benchmarks. These exemptions are necessary because of the inability of small and rural carriers to triangulate without 3 cell sites present within a county.

For all carriers with less than 10 million subscribers that cannot comply with new E911 location accuracy benchmarks, the FCC should establish a flexible waiver process with a presumption in favor of granting waivers. The following factors should be acknowledged as mitigating factors towards compliance:

- Whether the carrier is facing impediments to obtaining and/or deploying needed technology, including, but not limited to:
 - next-generation, advanced handsets that will allow RCA members to achieve location accuracy requirements;
 - reductions in the amount of universal service support received by a carrier;
 - unforeseeable technical issues;
 - system or network compatibility issues;
 - problems or delays with third party vendors or suppliers; or
 - zoning or permitting delays, etc.
- The extent to which the number of counties in the carrier's service area where location accuracy is negatively affected by terrain or heavy forestation exceeds 15% of the counties covered by the carrier; and
- Whether the carrier is experiencing customer resistance (e.g., low handset churn) to upgrading customer premise equipment (CPE) and the impact this resistance is having on the carrier's compliance with E911 location accuracy rules.

This list of factors is not exhaustive.

For the FCC to track their progress in implementing the new E911 location accuracy standards, carrier's that receive an exemption or a waiver from the FCC's new requirements should file a report with the PSAP providing estimates or expectations about when they will be compliant with the new requirements.