

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

In the Matter of)
)
Framework for Next Generation 911) PS Docket No. 10-255
Deployment)
)

REPLY COMMENTS OF TRUEPOSITION, INC.

TruePosition, Inc. (TruePosition) submits these reply comments in response to the Commission's *Notice of Inquiry (NOI)* addressing the Framework for Next Generation 911 (NG911) Deployment.¹ TruePosition is a leading provider of wireless location solutions and technology. Its Uplink Time Difference of Arrival ("U-TDOA") system is the principal network based location technology deployed in the United States.

TruePosition's comments are directed to improving mobile location accuracy. The foundation of NG911 is that its critical elements, such as location accuracy, demonstrate how emergency response will be advanced. That showing will flow from clear requirements and particularity as to those responsible. Compliance with Commission rules should be subject to verification and enforcement, with reasonable transition periods and a waiver policy addressing unique circumstances. The responsibility to transmit more precise location information so it provides meaningful and enhanced assistance to emergency response is integral to NG911's success.

¹ In the Matter of Framework for Next Generation 911 Deployment, *Notice of Inquiry*, FCC 10-200, PS Docket No. 10-255 (December 21, 2010).

The Commission has noted how improved location accuracy and NG911 are interwoven.² The challenge to obtain public and private investment and commitment to design, deploy and manage NG911 requires a regime of transparent performance standards able to evaluate all technologies by objective criteria. NG911 cannot prescribe a specific technology; it must promote innovation and improvements keeping pace with citizen and public safety expectations. Linking NG911 specific improvements to the Commission's rules will bring clarity to the public interest at stake and unify those who share in making it happen- the Congress and state legislatures, state and local agencies, carriers and providers and infrastructure and subscriber and other technology manufacturers. Fulfilling NG911's promise is inextricably linked to defined Commission action.

Comments Addressing Location Accuracy

Comments addressing location accuracy emphasize its critical role in expediting emergency response, how public safety relies on it and that the technical improvements that have emerged to provide more precise information must be part of NG911's foundation.

The State of California relates it is imperative that the accurate location of any caller who uses 911 be delivered to the PSAP quickly. California states that regulations must require access providers to present call location data to end systems and/or voice service providers on reasonable and non discriminatory terms using standard protocol interfaces. Networks not able to discover, validate and convey location information should not be included in the NG911 regime.³

² In the Matter of Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114 and E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196, *Further Notice of Proposed Rulemaking and Notice of Inquiry*, FCC 10-177 (September 23, 2010) at paragraphs 1, 2, 3 and 33.

³ Comments of the State of California at page 16 (February 28, 2011), *See also* Comments of St. Louis County Emergency Communications Commission (February 28, 2011) at pages 3, 5.

The International Association of Police Chiefs (IACP), International Association of Fire Chiefs (IAFC) and the National Sheriffs' Association (NSA) note in a joint comment the growing reliance on wireless services and the crucial need for accurate outdoor and indoor location capability. IACP, IAFC and NSA convey heightened concern regarding the large percentage of wireless 911 calls from the public made indoors where GPS satellite signals are not reliable. This circumstance presents significant risk that the location of 911 callers and public safety personnel will not be available to a large portion of the population and responding officers. IACP, IAFC and NSA embrace the technology trend portending significant improvements in location accuracy and availability and urge the Commission to adopt accuracy and indoor availability guidelines that pursue significant improvements over time. The joint comment concludes that the pressing public safety need for reliable, accurate location capabilities in urban and indoor environments stands out as a vital challenge NG911 must address.⁴

Deploying Location Accuracy in NG911

NG911 must distinguish among devices and systems. TruePosition agrees with comments stating that not all devices have to be linked to 911. The Commission can balance citizen expectation, technical capability and cost and strike a balance capturing those current and future devices and systems that must be linked to 911.⁵ What is crucial is that any 911 device or system complies with all 911 requirements, not just its concept. Significant elements, such as transmitting location information comporting with the Commission's rules, are vital to 911's

⁴ Joint Comments of the International Association of Police Chiefs, International Association of Fire Chiefs and the National Sheriffs' Associations at pages 3-4 (February 28, 2011).

⁵ Comments of the National Emergency Number Association (NENA) at page 16 (February 28, 2011), Comments of the State of California at page 10.

credibility. Citizens and public safety responders must rely on it. NG911 must be the source of improvement; disparate capabilities across devices and systems weaken it.

The improvements the Commission pursues through testing outdoor and indoor environments in the CMRS environment must carry through and be part of NG911's foundation. As noted, the limitations of an all Assisted Global Positioning System (A-GPS) environment are well documented. TruePosition reiterates that meaningful improvements are obtainable within reasonable cost parameters. Just as a hybrid of prevailing technologies U-TDOA and A-GPS has emerged as a source for real improvement in CMRS, so it can for NG911's broadband environment. The hybrid leverages the strengths of these two vibrant location solutions to enhance locating an emergency in an economically achievable manner.

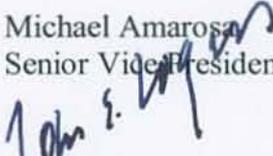
CONCLUSION

The Commission's commendable pursuit to move the Nation's emergency response networks to the broadband environment will be enhanced if it embraces improvements to location accuracy technology and establishes defined and verifiable rules for NG911. The result will be meaningful improvement in finding an individual confronted with an emergency.

Respectfully submitted,

TruePosition, Inc.

Michael Amarosa
Senior Vice President-Public Affairs



John E. Logan
Attorney for TruePosition, Inc.
1050 Connecticut Avenue, NW
Tenth Floor
Washington, D.C. 20036
202.772.1981

March 14, 2011