

Comments to FCC 2010-0318-0001 due 1.3.2011

We see that there is an expected delivery of Emergency Services on Local and State levels that are not covered by local or State laws. You state:

*"To ensure this benefit is realized, such technology must enable public safety personnel to obtain accurate information regarding the location of the caller. The Commission's existing Enhanced 911 (E911) rules require wireless carriers to meet standards for provision of location information when emergency calls are made via mobile telephone networks."*

You continue:

*"Our aim is to ensure that the Commission is doing everything within its power, in conjunction with the public safety community and service providers, to ensure that Americans have access to the most forward-thinking technologically advanced emergency response systems in the world."*

In California, we have Public Safety Elements as part of the General Plans, but we have no guidance on the incorporation of the current technology into the General Plans, a State of California law.

On a local level, we are faced with antennae installation with no regard to location accuracy capabilities. We feel that the non-disclosure of the technology has placed residents susceptible to industry pressure on the Planning Department and a misunderstanding of what the law intended.

Market competition has replaced feasibility of use. The more a carrier can install, the more guarantee of market share, with no regard to Public Safety and Emergency Response Systems. How does a small business compete in this type of market, where political connections and contributions count?

We do not know if this is still the case, but hospitals and public safety departments could not talk to one another.

We see no requirements to be reported, monitored or mitigated on applications of system installation. No mandates and no disclosure to the public.

We have a disconnect with the public and a burden of proof on us.

You need to add language that has State and Local Governments meeting a reporting requirement from data given to them by the carriers/suppliers.

We need to know how the build environment changes accuracy. Or, how mountainous terrain or desert changes accuracy.

We would also ask that you include Public Safety personnel with expertise in emergency communications to help guide these rules. Rules without application and practice are meaningless to the public.

Not mentioned but predominant in the City of Los Angeles with over 100 languages spoken, is how the location accuracy works without language ability. We urn for Emergency Planning on a realistic level down to the streets and find little to none.

Who will be the test cases? California has the Environmental Quality Act which would contribute toward mitigation, but the industry has been hands-off because of Federal regulations.

Executive Order 13132 needs to be applied to be realistic to the applications.

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