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Anne Kronenberg
Executive Director

March 25, 2013

The Honorable Julius Genachowski, Chairman
Federal Communications Commission (FCC)
445 12th Street, S.W.
Washington, DC 20554

RE: WT Docket No. 11-49

Dear Chairman Genachowski,

The City and County of San Francisco Department of Emergency Management (DEM) oversees emergency preparedness and 9-1-1 communications for San Francisco. As the agency that provides emergency communications to one of the largest and most dense urban areas in the nation, which includes a large number of high-rise residential and commercial buildings, we urge the Federal Communications Commission to take action to ensure the rapid implementation of technologies that can deliver vertical positioning information. This technology could save lives by directing first responders more quickly and accurately to the exact position of an emergency incident.

Our 9-1-1 center serves a population of nearly one million people, and processes up to 2,600 9-1-1 calls per day. Our dense urban environment includes dramatically variable natural and urban topography. Effective emergency response requires highly accurate routing of 9-1-1 calls and the ability for first responders to rapidly locate callers. However, current E9-1-1 location technology can be unreliable and often unavailable indoors, where 70% of all wireless 9-1-1 calls originate annually. In dense urban areas such as downtown San Francisco even outdoors urban canyons can hinder GPS based positioning. Vertical positioning is a critical element of a caller's location in a city of high rises, but current technologies are unable to provide accurate location information.

DEM is aware that the Commission's Communications Security Reliability and Interoperability Council, Working Group 3 (CSRIC III) has conducted trials that have demonstrated precise positioning in very challenging indoor and dense urban canyons. These trials demonstrated the capability of determining a user's position within 5-6 seconds, fast enough for use in routing E9-1-1 calls. DEM believes that any technology that can deliver precise location in a short period of time could provide a critical improvement to the emergency dispatch capabilities of Public Safety Answering Points (PSAPs).

Based on our review of the Commission's CSRIC WG III we believe that this technology may provide a very promising solution to the indoor and vertical location accuracy. Because of the promise advanced position location technology offers to improve public safety response, DEM urges the Commission's strong support for advancing this technology.

Sincerely,

A handwritten signature in blue ink that reads "Lisa Hoffmann".

Lisa Hoffmann
Deputy Director, Division of Emergency Communications