



International Association of
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March 29, 2013

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

RE: WT Docket No. 11-49

Dear Chairman Genachowski:

The International Association of Chiefs of Police ("IACP") is a worldwide organization of more than 20,000 members that serves as the professional voice of law enforcement. IACP is a strong advocate for constantly improving the standard of policing and public safety and believes that the current limitations of E9-1-1 location technologies pose a significant public safety concern. As the Commission is aware, mobile phones are used for more than 70 percent of 9-1-1 calls, and many of these calls are placed indoors where location information is often unreliable or unavailable. The limitations of location information are already having a negative impact on our public safety response. IACP therefore believes that facilitating the development and availability of improved location accuracy technologies is a critical public safety priority.

We understand that Progeny LMS, LLC and its parent company, NextNav Holdings, LLC ("Progeny/NextNav"), have been responding to this technological need by constructing a nationwide network of positioning beacons using spectrum in the 902-928 MHz Multilateration-Location and Monitoring Service ("M-LMS"). IACP recently reviewed the results of testing on this network carried out in December 2012 by the Commission's Communication's Security, Reliability and Interoperability Council ("CSRIC"). These results show that Progeny/NextNav's technology is capable of providing rapid and accurate location fixes even for callers within large, multistory buildings.

IACP believes that this technology represents a clear improvement over current techniques, and based on these results, we believe that the Progeny/NextNav system, or a system of equal capabilities, offers a valuable tool to improve the capabilities of the public safety system for consumers and first responders. Because of the promise of these capabilities, the CSRIC report concluded that the "standardization, commercial availability and deployment of such technologies are priorities for all stakeholders." We concur with this assessment, and urge the Commission to take the steps necessary to ensure that this technology can be made available to public safety as soon as possible.

Although the IACP does not specifically endorse any particular location technology service provider, we do consider this technology a very promising location technology with the potential to meet the needs of the public safety community.

IACP understands that the commercial availability of the Progeny/NextNav system, or a similar system, is conditioned on demonstrating that its service does not cause unacceptable interference to Part 15 devices. IACP also understands that, pursuant to this requirement, Progeny/NextNav has carried out more than a year of testing with Part 15 manufacturers and users and that the Commission is currently reviewing the results of this testing. Because of the importance of improved location service to public safety and to the effectiveness of the 9-1-1 system as a whole, IACP encourages the Commission to expeditiously complete its review of this matter and to authorize this promising technology for service to the public and to emergency services as quickly as possible.

Thank you for your consideration.

Respectfully,

Bart R. Johnson

Executive Director

International Association of Chiefs of Police

Copied: Commissioner Clyburn
Commissioner McDowell
Commissioner Rosenworcel
Commissioner Pai

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