



Leaders in Public Safety Communications®

May 6, 2013

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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 11-49

Dear Ms. Dortch:

The Association of Public-Safety Communications Officials (“APCO”) International writes today to reiterate our position that the development and availability of technologies for improved indoor location determination for wireless Enhanced 9-1-1 calls remains a public safety priority.

Founded in 1935, APCO is the nation’s oldest and largest public safety communications organization. Most APCO members are state or local government employees who manage and operate communications systems – including Public Safety Answering Points (PSAPs), dispatch centers, radio networks, and information technology – for law enforcement, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO has long been involved in Commission proceedings regarding 9-1-1 capability and other aspects of public safety communications, and has routinely provided its experience and expertise to the Commission on matters pertaining to the 9-1-1 system and other aspects of public safety communications.

The Commission’s wireless E9-1-1 requirements generally enable PSAPs to receive a wireless 9-1-1 caller’s location information. Under certain circumstances, however, location information especially from indoor locations can be absent, inaccurate, or simply not actionable. Clearly, and as APCO has previously informed the Commission, the lack of reliable and accurate location information can create life-threatening delays for emergency response.

APCO has therefore long encouraged the Commission to take steps to promote the development of more precise 9-1-1 caller location information. APCO has also facilitated and actively participated in multi-stakeholder efforts to define standards and test new approaches to improve the reliability and accuracy of location information, including co-chairing the Commission’s Communications Security, Reliability, and Interoperability Council III (“CSRIC”) Working Group 3.

With regard to the March 14, 2013 Indoor Location Test Bed Report (“Report”) produced by Working Group 3, APCO takes no position here on the technical merits of any of the technologies tested as part of the indoor location test bed. However, APCO emphasizes that efforts to continually improve wireless E9-1-1 accuracy is a public safety priority. In this regard, APCO has consistently supported regulatory and technical initiatives targeted at achieving even incremental steps toward ensuring accurate, actionable location information is available for every 9-1-1 call. Indeed, the efforts of Working Group 3 proved very worthwhile, by demonstrating the potential for significant improvements in both horizontal and vertical accuracy.

Thus, there is a clear public safety benefit in the testing conducted by the Working Group. APCO has a record of developing and endorsing standards and supports the recommendations made by the Working Group 3 concerning the need for standardization and deployment of new technologies. Accordingly, APCO encourages the Commission to continually promote the availability of technologies that can lead to advancements in location information.

Please contact the undersigned should the Commission require any additional information.

Respectfully submitted,

/s/

Terry Hall
President