



PUBLIC NOTICE

Federal Communications Commission
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PUBLIC SAFETY AND HOMELAND SECURITY BUREAU ANNOUNCES WORKSHOP ON E911 PHASE II LOCATION ACCURACY

PS Docket No. 07-114

Workshop Date: October 2, 2013
Comments Due: September 25, 2013

On October 2, 2013, the FCC's Public Safety and Homeland Security Bureau (Bureau) will host a public workshop to discuss recent developments in the use of wireless technology to contact emergency services. The workshop will explore current trends that may be affecting the provision and quality of 911 location information delivered to Public Safety Answering Points (PSAPs), including the increased volume of wireless 911 calls and the increase in wireless calls originating from indoor locations. The workshop will also examine issues raised in the August 12, 2013 *ex parte* filing by the California chapter of the National Emergency Number Association (CALNENA) regarding the percentage of wireless 911 calls in which E911 Phase II location information is provided to PSAPs.¹ Finally, the workshop will explore potential solutions that could improve the delivery of accurate E911 location information. The workshop will be held at FCC Headquarters, 445 12th Street, SW, Washington DC, 20554. Further details regarding the workshop participants, panels, and times will be announced by future public notice.

In advance of the workshop, the Bureau invites interested parties to comment on the issues listed below that will be the subject of discussion at the workshop. The Bureau also intends to make certain wireless 911 call tracking data relating to the provision of Phase II location information available in the record of PS Docket No. 07-114, and invites interested parties to submit relevant call tracking data as well, which will likewise be placed in the docket for public review and comment.

TOPICS FOR COMMENT

- Wireless usage has expanded significantly over the past few years. Americans are not only using wireless phones for a greater percentage of calls, they are increasingly using wireless phones for all calls, including calls to 911 from indoor environments.² How have wireless

¹ Letter from Danita L. Crombach, ENP, CALNENA, to the Honorable Mignon Clyburn, Chairwoman, Federal Communications Commission, PS Docket No. 07-114 (filed Aug. 12, 2013) (CALNENA *ex parte*).

² J.D. Power's 2011 *Wireless Call Quality Study – Volume 1*, conducted during the second half of 2010, showed that an average of 56 percent of wireless calls were made from indoors, up from 40 percent in 2003. See J.D. Power and Associates, 2011 U.S. Wireless Call Quality Performance Study, Volume 1, available at <http://www.jdpower.com/content/press-release/Kp2D0Ys/wireless-call-quality-performance-study.htm> (last visited Sept. 9, 2013) (*J.D. Power 2011 Wireless Call Quality Study – Vol. 1*). Also in 2011, *Consumer Reports* stated that 60 percent of 911 calls were placed through wireless phones. See *For 911, is a Cell Phone as Safe as a Landline?*, CONSUMER REPORTS MAGAZINE, (Jan. 2011), available at <http://www.consumerreports.org/cro/magazine-archive/2011/january/electronics/best-cell-phones/911-from-cell-phone/index.htm> (last visited Sept. 9, 2013). More

providers and PSAPs been affected by the increase in the volume of wireless calls to 911, and how have they modified their practices to account for such changes? In addition, we seek the submission of specific data that quantifies the increase in wireless calls to 911, particularly the increase in wireless 911 calls from indoor environments.

- How has the increase in wireless calls to 911, particularly from indoor environments, affected the ability of wireless providers to deliver Phase II location information?
- What factors affect whether individual 911 calls include or do not include delivery of Phase II location information to the PSAP? For example:
 - What is the impact of 911 call duration on the ability of different technologies to provide Phase II location information to the PSAP?
 - To what degree is the delivery of Phase II information to the PSAP with each call a function of automated versus manual processes?
 - What is the role of rebid procedures when Phase II information is not delivered to the PSAP with the initial 911 call?
 - Are there other network or operational issues that can affect a carrier's ability to deliver Phase II information with each call and/or the PSAP's ability to receive the information?
- What measures do PSAPs and wireless providers undertake, in terms of ongoing monitoring of Phase II performance, both on an individual call basis and an aggregated basis? What types of metrics are monitored and how are they measured?
- In what percentage of wireless 911 calls is Phase II location information successfully delivered to the PSAP? How does current Phase II yield (percentage of wireless 911 calls that include Phase II location information) compare to Phase II yield in the past few years?
 - Is there a correlation between trends in Phase II yield and an increase in the number of wireless calls originating from indoors?³
 - Is Phase II yield affected by wireless providers' migration to new network technologies, *e.g.*, from 2G to 3G/4G networks?
 - Is Phase II yield affected by the wireless provider's choice of location technology (*e.g.*, network- versus handset-based location solution) or changes in the location technology used (*e.g.*, migration to A-GPS)?
 - Are there variations in the delivery of Phase II location information based on the type of environment (*e.g.*, urban versus rural environments, indoor versus outdoor environments)?
- According to the CALNENA filing, of the 1,589,580 wireless 911 calls received statewide in March 2013, less than half of those calls included Phase II location information.⁴ Does the data in the record support CALNENA's contention that there has been a decline in the delivery of accurate Phase II location information in the past few years?
- In 911 calls where Phase II location information is delivered to the PSAP, has the overall quality and accuracy of the information improved, declined, or remained unchanged in

recently, a letter from the San Francisco Department of Emergency Management indicated that 70 percent of all wireless 911 calls originate indoors. *See* Letter from Lisa Hoffman, Deputy Director, Division of Emergency Communications, San Francisco Department of Emergency Management, to Julius Genachowski, Chairman, FCC, WT Docket No. 11-49 (filed Mar. 25, 2013).

³ According to J.D. Power, "Typically, wireless calls placed indoors result in slightly more problems, on average, than calls placed outdoors." *J.D. Power 2011 Wireless Call Quality Study – Vol. 1*.

⁴ CALNENA *ex parte* at 2.

comparison to the past few years? To what extent, if any, has the overall quality and accuracy of Phase II location information been affected by:

- The increase in wireless calls originating from indoors?
 - Wireless providers' migration to new network technologies?
 - Changes in the location technology used by carriers?
 - Type of environment (e.g., urban versus rural environments, indoor versus outdoor environments)?
- How is the ability of PSAPs to respond to 911 calls affected by the availability or unavailability of Phase II location information, the time required to obtain a Phase II fix (including rebids), and the quality of the Phase II information when it is provided?
 - What efforts are stakeholders making (or can they make in the future) to improve Phase II yield and the accuracy of Phase II information?
 - What solutions are available to improve the delivery of Phase II information, including improving location accuracy both outdoors and indoors, and what are the costs of such solutions?
 - What additional measures, including regulatory action, could help improve the delivery of Phase II E911 location information in the near term? In light of the expanding role of wireless technology in communicating with emergency services, are there regulatory gaps in the Commission's E911 rules? Are there public safety requirements for location accuracy that are not being met by the rules?
 - Is currently available location technology able to deliver more precise location information than the Commission's current E911 rules require?
 - What is the potential for current technology to provide vertical location (z-axis) as well as horizontal location (x- and y-axis)?
 - What is the potential for future location technology to improve accuracy performance, particularly as providers deploy 4G networks and increase the use of small cells and other advanced infrastructure?

We encourage interested parties to help inform the discussion at the workshop, as well any subsequent Commission action on these issues, by filing comments in response to these questions and on the data made available in the public record.

FILING PROCEDURES

Interested parties may file comments on or before the dates listed on the first page of this *Public Notice*. All comments and reply comments should reference **PS Docket No. 07-114**. Parties may file comments using: (1) the Commission's Electronic Comment Filing System (ECFS), (2) the Federal Government's eRulemaking Portal, or (3) by filing paper copies.⁵

- Electronic Filers: File comments electronically using the Internet by accessing the ECFS: <http://www.fcc.gov/cgb/ecfs/> or the Federal eRulemaking Portal: <http://www.regulations.gov>. Filers should follow the instructions provided on the website for submitting comments.
- If multiple docket or rulemaking numbers appear in the caption of this proceeding, ECFS filers must transmit one electronic copy of the comments for each docket or rulemaking number referenced in the caption. In completing the transmittal screen, filers should include their full

⁵ See Electronic Filing of Documents in Rulemaking Proceedings, GC Docket No. 97-113, *Report and Order*, 13 FCC Rcd 11322 (1998).

name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic comment by Internet e-mail. To get filing instructions, filers should send an e-mail to ecfs@fcc.gov, and include the following words in the body of the message, "get form." We will send a sample form and directions in response.

- Paper Filers: Parties who choose to file by paper must file an original and four copies of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.

Send filings by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). Address filings to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- Deliver hand-delivered or messenger-delivered paper filings to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554 between 8:00 AM and 7:00 PM. Use rubber bands or fasteners to hold deliveries together. Dispose of all envelopes before entering the building.
- Send commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- Send U.S. Postal Service First-Class, Express, and Priority mail to 445 12th Street, SW, Washington DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY).

Address all filings to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Room TW-A325, Washington, DC 20554. Parties shall also serve one copy with the Commission's copy contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC 20554, (202) 488-5300, or via e-mail to fcc@bcpweb.com.

Audio/video coverage of the meeting will be broadcast live with open captioning over the Internet from the FCC's web page at www.fcc.gov/live. The FCC's webcast is free to the public.

Reasonable accommodations for persons with disabilities are available upon request. Please include a description of the accommodation you will need. Individuals making such requests must include their contact information should FCC staff need to contact them for more information. Requests should be made as early as possible. Please send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau: 202-418-0530 (voice), 202-418-0432 (TTY).

For additional information, please contact Eric Ehrenreich or Dana Zelman of the Policy Division of the Public Safety and Homeland Security Bureau. Eric Ehrenreich can be reached by phone at (202) 418-1726 or by email at Eric.Ehrenreich@fcc.gov; Dana Zelman can be reached by phone at (202) 418-0546 or by email at Dana.Zelman@fcc.gov.

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