



INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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September 25, 2013

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

RE: PS Docket No. 07-114, Wireless E911 Location Accuracy Requirements

Dear Ms. Dortch:

On behalf of the nearly 10,000 fire and emergency services chiefs of the International Association of Fire Chiefs (IAFC), I write to express the IAFC's view that the deployment of advanced location technologies is critical to the future of emergency calling systems, public safety response capabilities, and to the personal safety of all first responders. As the Federal Communications Commission (FCC) has acknowledged—most recently in its 2011 Third Report and Order on wireless E911—current indoor limitations on location accuracy are a “significant public safety concern” that requires development of technical solutions.

The IAFC believes that obtaining the accurate location of people who contact Public Safety Answering Points (PSAP) for emergency assistance, whether calling from indoor or outdoor locations, or using fixed line or wireless handsets, is vital to public safety's timely response. Currently, the FCC's rules establish an automated location information and accuracy standard for PSAP calls and contacts, including those initiated using wireless handsets outdoors, but not for wireless calls initiated indoors. The majority of emergency calls placed to Emergency 911 are made from indoors and large and growing shares of emergency calls are made from wireless communication devices.

The IAFC also believes that now is the appropriate time for the FCC to update its current rules to reflect the technological advancements that occurred since the rules were first created. The IAFC applauds the Public Safety and Homeland Security Bureau (Bureau) for holding the public workshop on October 2. Once the workshop is held, the IAFC encourages the FCC to issue a notice of proposed rulemaking (NPRM) to receive further input on what technology can achieve today. It is our view that technology now exists that can be used for indoor location. The IAFC would certainly support FCC revised rules that require significant improvements in indoor location accuracy over a period of a few years.

The IAFC previously provided comments on Docket 11-49. In those comments, we made clear that the IAFC does not specifically endorse any particular location technology or location service provider or vendor. In addition, we urged the commission to complete its review in a timely manner so as to move forward with evaluating indoor location technologies.

In a follow up letter to David Turetsky, Bureau Chief of the Public Safety and Homeland Security Bureau, the IAFC set forth some key principles to keep in mind from a public safety standpoint:

- Accuracy of any indoor location technology is important for public safety in both rural and urban environments.
- The deployment of effective indoor location technology is important for the fire service, emergency medical services and public safety in general.
- Location technology must be readily deployable and easy to use for public safety.
- Indoor location technology must be cost-effective for public safety to use. If the technology is not cost-effective, public safety will not be able to afford it.

The IAFC appreciates all the work that the FCC has done to date on this vital issue which is important for the fire and emergency medical services, and public safety in general. We look forward to continuing to work with the FCC on this critical issue. Please contact Jim Goldstein, the IAFC's Government Relations and Policy Manager, at 202-494-6607 or jgoldstein@iafc.org, if we can be of assistance on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Metcalf". The signature is fluid and cursive, with a large, stylized initial "W".

Chief William R. Metcalf, EFO, CFO, MIFireE
President and Chairman of the Board, IAFC