



1300 I Street, NW
Suite 400 West
Washington, DC 20005

November 14, 2013

(202) 515-2466
(202) 336-7922 (fax)
nneka.chiazor@verizon.com

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

Verizon looks forward to participating in the Public Safety and Homeland Security Bureau's November 18th workshop on E911 Phase II location accuracy issues. As the Commission has indicated that E911 delivery issues will be discussed at the workshop, Verizon is compelled to respond to the attached November 7th statement from the Find Me 911 Coalition (the "Coalition") because the statement makes numerous incorrect and misleading claims about 911 call performance for the State of Texas based on data the Bureau has posted online.¹ (This letter focuses on the Texas data, but another Coalition statement released Tuesday made similarly inaccurate claims concerning data for Delaware County, Pennsylvania.)

Verizon Delivers Phase II Data Consistent with FCC Rules and PSAP Practices.

Verizon is timely delivering location information for use by PSAPs in compliance with Commission rules and long-accepted industry practices that were developed cooperatively with the PSAP community. Specifically, Verizon provides "Phase II" data derived from its Assisted-GPS Phase II solution to the PSAP through its Mobile Positioning Center ("MPC") *for over 90% of 911 calls Texas-wide*. As to Verizon, therefore, the statements attributed to the Coalition's spokesperson are demonstrably false, including the claims that in June 2013 *two thirds* of 911 calls in Texas "lacked accurate 'Phase II' location information, despite FCC regulations requiring accurate location data to be provided with all calls" and "[i]n most cases, the 9-1-1 call center only received basic 'Phase I' data"²

¹ See <http://www.fcc.gov/encyclopedia/phase-2-data-sets> ("Texas Aggregate Phase 2 Data").

² See Find Me 911, *New Data Show More than 2/3 of Texas 9-1-1 Calls From Cell Phones Delivered Without Location Information*, Nov. 7, 2013, <http://findme911.org/news/more-than-2-3-of-texas-9-1-1-calls-from-cell-phones/> (quoting Jamie Barnett, Director of the Find Me 911 Coalition); see also Find Me 911, *New Data Show 65% OF 9-1-1 Calls From Cell Phones in Delaware County Delivered Without Caller Location Information*, Nov. 12, 2013, <http://findme911.org/news/new-data-show-65-of-9-1-1-calls-from-cell-phones-in-delaware-county-delivered-without-caller-location-information/> (making similar claims).

The Coalition’s Statement Mischaracterizes the Texas Data. The Texas data on which the Coalition’s statement relies is substantially the same as that reported by the California Chapter of the National Emergency Number Association (“CALNENA”) in August. It says nothing about whether location information was delivered in accordance with the Commission’s rules, but instead indicates only whether the PSAP retrieved available Phase II data at some point from the MPC during the 911 call, in accordance with industry and PSAP practices.³ This is confirmed by data submitted by two 911 districts in Texas, both of which provided call data with similar ratios of “Phase I and “Phase II” information, but made it expressly clear that their data did not indicate whether Phase II location information was available for look-up at the MPC as provided by the Commission’s rules.⁴ Notably, data from Harris County, Texas further indicates that Phase II location was available there for 88% of 911 calls when accounting for an automatic look-up, and that it was available for *more than 93%* of calls for handset-based providers like Verizon.⁵

Verizon Appropriately Routes 911 Calls Based on Cell Site Location. The Coalition’s statement suggests that the delivery of Phase II data to the MPC as provided under existing rules in some cases “contributes to misdirected calls, as incoming calls do not have the necessary location data to be routed to the appropriate emergency call center automatically.” This is incorrect: 911 call routing is based on *Phase I* cell site location information and consensus-based arrangements with individual PSAPs. Verizon routes 911 calls in accordance with those long-established methods.

Verizon Delivers Phase II Data to the PSAPs Expeditiously. The Coalition’s statement states that, under the process embodied in existing rules, an automatic look-up “leaves the operator blind to the location of any caller who is not able to stay on the line for at least 30 seconds.” As Verizon explained in response to the CALNENA report, it has taken a number of measures to expedite the availability of Phase II data at the MPC.⁶ Network-wide, Verizon is now able to make Phase II information available within an *average* of 12-15 seconds, and within 25 seconds for 99 percent of all calls for which Phase II information is available.⁷

³ Verizon described the legal and technological framework for E911 Phase II location delivery in its September 11, 2013 response to CALNENA. See Letter from Nneka Chiazor, Verizon, to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 07-114, filed Sept. 11, 2013, at 3-6 (“Verizon Letter”).

⁴ See Bexar Metro 9-1-1 Network District, Letter to David Furth, PSHSB, at 1 (“because ECaTs data is collected at call termination, it does not indicate whether wireless carriers could not or would not have Phase 2 location data available on rebid by the PSAP”), and Capital Area Emergency Communications District Data (“The data does not imply that wireless carriers could not or would not have made phase 2 location data available on rebid.”), both available at <http://www.fcc.gov/encyclopedia/phase-2-data-sets>.

⁵ See Greater Harris County 9-1-1 Emergency Network, Letter to David Siehl, PSHSB, dated Sept. 24, 2013.

⁶ See Verizon Letter at 7-8.

⁷ Data filed by King County, Washington for 2012 based on its own testing – which the Coalition also does not acknowledge – indicates that using a re-bid of 20 seconds Phase II available was available for 98 percent of outdoor Verizon calls, and 93 percent of indoor calls. See Letter from Marlys Davis, E-911 Program Office, King County, to Marlene H. Dortch, in PS Docket No. 07-114, at 3-4, available at <http://www.fcc.gov/encyclopedia/phase-2-data-sets>.

Verizon Delivers Accurate Phase II Data to PSAPs. Finally, the Coalition asserts that “data released by carriers in California,” presumably in response to the CALNENA report, “indicated that more than 20% of locations reported as Phase II during the rebid process are actually based on significantly less accurate technologies” Again, as to Verizon, this assertion is patently wrong, as its solution is configured such that all caller location reported as Phase II to PSAPs is just that – Phase II. Verizon’s Phase II figures are limited to more accurate A-GPS, hybrid, and AFLT location fixes; when a location fix is derived from the other less accurate techniques, Verizon Wireless has directed its MPC vendors to make Phase I cell site location information available to the PSAP instead.⁸

In conclusion, Verizon has long supported and worked cooperatively with public safety groups to address the needs of the public safety community and looks forward to continuing to do so. And we fully recognize it is perfectly fair for public safety stakeholders to raise for discussion questions as to whether it is possible for wireless carriers to improve the delivery of accurate Phase II location information for PSAPs going forward. In addressing these issues, one must account for the challenge of locating 911 callers in a mobile environment, and the capabilities of carriers’ and PSAPs’ networks and location technologies, among other things. But it is not appropriate to make inaccurate or misleading claims about compliance with current rules or carriers’ performance, particularly when carriers have already squarely rebutted the basis for those claims. With respect to Verizon at least, the Coalition’s statements do just that, which serves no one’s interest.

Please contact the undersigned if there are questions concerning this filing.

Sincerely,



Attachment

⁸ See Verizon Letter at 6-7.

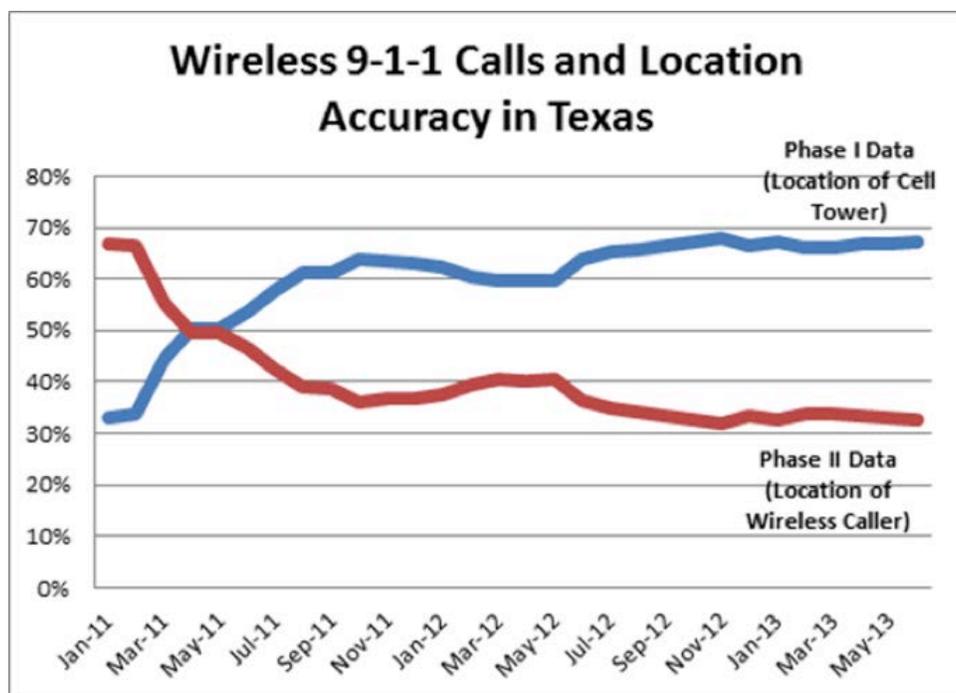
Find Me 911 News

New Data Show More Than 2/3 OF Texas 9-1-1 Calls From Cell Phones Delivered Without Location Information

November 7th, 2013

Data Filed with FCC Shows More than 400K Calls Arrived Without Accurate Location Info in 2013, Huge Decline in Location Quality Since 2011

Washington, DC – November 7, 2013 – New data released by the U.S. Federal Communications Commission (FCC) show that more than two-thirds of the calls to 9-1-1 emergency centers in Texas from wireless phones do not include the accurate location information necessary to find a caller in crisis. The data, provided to the FCC by state and local 9-1-1 agencies, show an alarming drop in more accurate “Phase II” data in Texas from 67% of all wireless calls in January 2011 to just 33% in June 2013, despite a dramatic increase in cell phone calls over the same period.



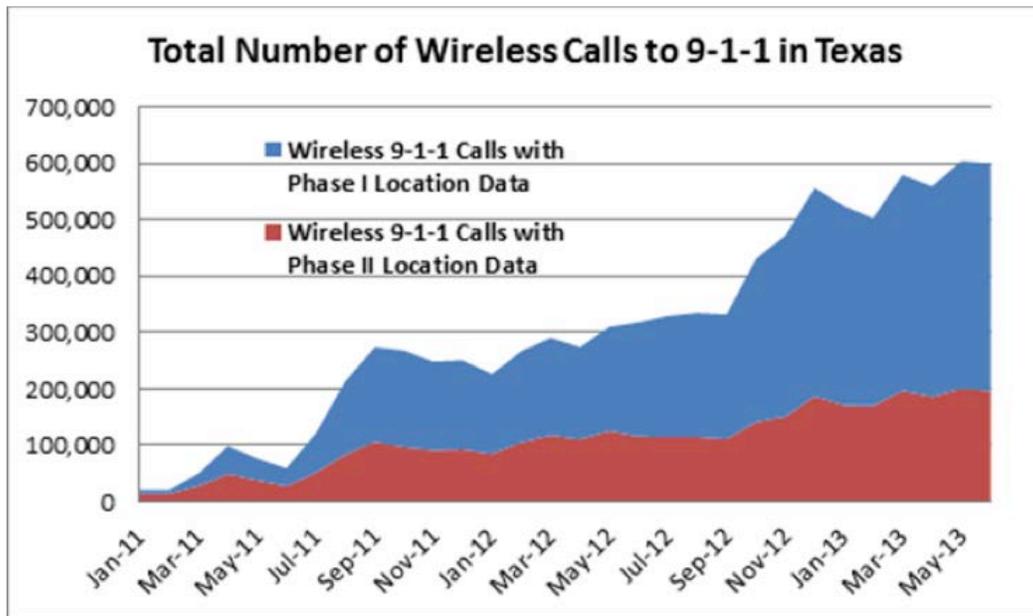
Source: Federal Communications Commission, <http://.fcc.gov/encyclopedia/phase-2-data-sets>

“If you use a cell phone, you probably think that a 9-1-1 operator can find you if you call in an emergency. In Texas, that assumption could be fatally flawed,” said Jamie Barnett, former Chief of the FCC’s Public Safety and Homeland Security Bureau and Director of the Find Me 911 Coalition. “For two-thirds of wireless callers in Texas, the emergency call arrived without accurate information on the caller’s location, putting lives at risk when callers don’t know or

can't share their location. The FCC should take immediate action to ensure that all 9-1-1 callers can be immediately located in a crisis, whether indoors or outside, in a rural or urban setting.”

Texas statewide data released by the FCC found that 403,571 – or 67% - of the 601,106 wireless 9-1-1 calls received in June 2013 lacked accurate “Phase II” location information, despite FCC regulations requiring accurate location data to be provided with all calls. In most cases, the 9-1-1 call center only received basic “Phase I” data showing the location of the cell tower from which the call originated, information of little use to emergency responders given the large area covered by each tower.

The data also highlighted the soaring number of wireless 9-1-1 calls received in the state over recent years.



Source: Federal Communications Commission, <http://www.fcc.gov/encyclopedia/phase-2-data-sets>

In addition to the state-wide data, The FCC reported similar 9-1-1 problems for four localities in Texas: the Bexar Metro 911 Network District, Greater Harris County 911 Emergency District, Capital Area Emergency Communications District, and El Paso 911 Communications Center. In all four cases, the data showed that a high percentage of calls lacked accurate location information.

Data from Harris County indicated that emergency centers were able to increase the percentage of Phase II responses by roughly 24% (from 63.7% to 88%) through automatic ‘rebidding’ to request the location information again from the carrier after at least 30 seconds.

The automatic rebid process, however, leaves significant public safety gaps.

- It contributes to misdirected calls, as incoming calls do not have the necessary location data to be routed to the appropriate emergency call center automatically.
- It leaves the operator blind to the location of any caller who is not able to stay on the line for at least 30 seconds.
- It delays lifesaving help while waiting for a rebid to get more accurate location information.

In addition, data released by carriers in California indicated that more than 20% of locations reported as Phase II during the rebid process are actually based on significantly less accurate technologies, potentially leading to false locations and misdirected emergency personnel.

"Some have tried to blame the 9-1-1 operators, but that is a diversion from the impact of these data, and it is not fair to the 9-1-1 professionals," continued Barnett. "This cannot simply be chalked up to 'rebidding' to request location information again during the call. Emergency personnel need accurate location data as soon as a 9-1-1 call arrives, both to ensure that it is routed to the appropriate call center and to respond to the emergency, particularly if the call is cut off before a location can be given."

"A 9-1-1 operator shouldn't have to wait and rebid and wait and rebid to hope they eventually get accurate location information, added Barnett. "This is a growing national crisis, and we urge the FCC and carriers to work with us to adopt indoor location requirements and solve this dangerous problem."

About the Find Me 911 Coalition

Find me 911 is an effort supported by more than 145,000 individuals, as well as national and local organizations. The individuals and organizations represent a broad range of 911 operators and first responders – emergency medical services personnel, fire fighters and police. Find Me 911 seeks to ensure that the Federal Communications Commission (FCC) move forward quickly to establish a reasonable, measurable level of location accuracy for emergency calls made indoors, enabling first responders to locate emergency calls from wireless phones from all locations rapidly and efficiently.

###