



900 2nd Street, N.E.  
Suite 303  
Washington, D.C. 20002  
Phone: 202-371-1277  
Fax: 202-682-FIRE  
Email: [update@cfsi.org](mailto:update@cfsi.org)

**William M. Webb**  
*Executive Director*

**William Jenaway**  
*President*

*Board of Directors*

**M.H. Jim Estep**  
**Louis J. Amabili**  
**Chris Neal**

**William "Giff" Swayne**

Visit us on the web:  
[www.cfsi.org](http://www.cfsi.org)

# CONGRESSIONAL FIRE SERVICES INSTITUTE

November 13, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

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

Dear Ms. Dortch:

On behalf of the Board of Directors of the Congressional Fire Services Institute (CFSI), I write today in support of the development of effective and accurate indoor location technology to assist the nation's fire and emergency services in responding to the more than 31 million emergency calls received annually.

America's firefighters are the first to arrive whenever their fellow citizens are in danger. Whether the incident is a fire, emergency medical call, a hazardous materials incident, or a natural disaster, fire departments are the first on the scene. In order to adequately protect the public, the fire service must have the ability to receive accurate information on the location of those in need.

As more Americans rely on cell phones as their primary means of communication, an increasing number of 9-1-1 calls made to Public Safety Answering Points (PSAP) are made from cell phones. A large number of these calls originate indoors. The deployment of advanced indoor location technologies is vital to the safety of the general public and first responders.

On October 24<sup>th</sup> of this year, CFSI's National Advisory Committee unanimously approved a resolution calling on CFSI to work with Congress and the Federal Communications Commission to ensure the deployment of effective, affordable, readily deployable, and easy to use indoor location technology that will meet the accuracy requirements of public safety. I have attached a copy of the resolution for your information.

I hope the FCC will move quickly to adopt rules to improve the location accuracy of wireless emergency 9-1-1 calls made from indoor locations. I am also glad the FCC is hosting a public workshop on this matter.

Thank you for your attention to this important issues and best wishes on your continued success and safety.

Sincerely,

William F. Jenaway, PhD  
President, CFSI Board of Directors

Attachment

**RESOLUTION IN SUPPORT OF FEDERAL AGENCY AND CONGRESSIONAL  
INITIATIVES TO ENSURE THE DEPLOYMENT OF EFFECTIVE INDOOR LOCATION TECHNOLOGY THAT WILL  
MEET THE NEEDS OF PUBLIC SAFETY**

Offered by:

International Association of Fire Chiefs  
International Association of Fire Fighters  
National Volunteer Fire Council

Whereas, obtaining the location of people who contact Public Safety Answering Points for emergency assistance, whether calling from indoor or outdoor locations, or using fixed line or wireless handsets, is vital to public safety response;

Whereas, FCC 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;

Whereas, the majority of emergency calls placed to Emergency 911 are made from indoors and a large and growing share of emergency calls are made from wireless communication devices;

Whereas, the accuracy of indoor location technology is important to public safety, in both rural and urban environments;

Whereas, the deployment of effective indoor location technology is important for fire service, emergency medical services and public safety in general.

Whereas, location technology must be readily deployable and easy to use for public safety;

Whereas, location technology must be cost-effective or public safety will not be able to afford to use it;

**Now, therefore, be it resolved that** the Congressional Fire Services Institute:

- 1) Requests Congress and the FCC to take action necessary to ensure the deployment of effective, affordable, readily deployable, and easy to use indoor location technology that will meet the accuracy requirements of public safety in a timely fashion.
- 2) Requests that the FCC enforce current location accuracy standards and adopt new standards for indoor location accuracy.