

Steve Largent
President/CEO

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VIA ELECTRONIC FILING

Mr. Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Mr. Chairman:

During the Commission's recent workshop on E911 location accuracy, you noted your deep commitment to wireless E911, your interest in working together on the next generation of challenges, and your awareness that solving these issues involves a "two-way street" among stakeholders – wireless industry and PSAPs included.¹ CTIA—The Wireless Association® and its member companies share these views and commend your leadership in the vital and demanding area of wireless E911.

As we move forward together across the range of important E911 issues, we want to highlight our serious concern with a recent study filed by the California state chapter of NENA (CALNENA) that asserted call location data is not meeting Phase II accuracy requirements. The wireless industry was concerned when it first learned of the study, and the four nationwide carriers immediately conducted their own reviews of 911 calls to the affected PSAPs.² Each of those investigations led to the same conclusion: the study mischaracterizes carrier performance, which comply with FCC rules and standards. These findings underscored the importance of PSAP best practices involving a process known as "re-bidding" to acquire Phase II location information after the initial call delivery. These reviews make clear that wireless carriers are meeting their 911 commitments to consumers and the public safety community, and we are troubled by continued suggestions to the contrary.

As you know, CTIA has a long history of working with the FCC, the PSAP community, and technology vendors to improve the safety of consumers. Wireless carriers have developed and deployed innovative E911 solutions to deliver, and to enhance, the location information available during a 911 call. Currently, we are actively involved in the work of the Communications Security, Reliability and Interoperability Council (CSRIC) to develop the next stage of its Indoor Location Test Bed examining the effectiveness of various technologies and products. And

¹ Video Transcript of Remarks by Chairman Tom Wheeler, Federal Communications Commission, Workshop On E911 Phase II Location Accuracy (Nov. 18, 2013) available at <http://www.fcc.gov/events/workshop-e911-phase-ii-location-accuracy> ("FCC Nov. 18 E911 Workshop").

² AT&T Ex Parte Letter, PS Docket No. 07-114 (Sept. 9, 2013); AT&T Comments, PS Docket No. 07-114 (Sept. 25, 2013); Sprint Ex Parte Letter, PS Docket No. 07-114 (Sept. 30, 2013); Sprint Comments, PS Docket No. 07-114 (Sept. 25, 2013); T-Mobile Ex Parte Letter, PS Docket No. 07-114 (Sept. 5, 2013); T-Mobile Comments, PS Docket No. 07-114 (Sept. 25, 2013); Verizon Ex Parte Letter, PS Docket No. 07-114 (Sept. 11, 2013); Verizon Comments, PS Docket No. 07-114 (Sept. 25, 2013); see also CTIA Comments, PS Docket No. 07-114 (Sept. 25, 2013).



beyond E911 location accuracy, the wireless industry is advancing a number of other public safety initiatives, including Wireless Priority Service, Wireless Emergency Alerts, Text-to-911, and Next-Generation 911. Industry is committed to improving consumer safety through mobile communications.

With respect to the CALNENA report, the carrier investigations not only revealed study flaws but also shed light on important re-bidding practices generally. In many instances, a 911 call is delivered to a PSAP with Phase I data while the carrier uses additional location solutions to acquire the more granular Phase II location data. PSAP best practices issued by NENA and APCO recognize that time is needed to derive and deliver Phase II location information and advise PSAPs to conduct at least one re-bid for the Phase II information during a 911 call. The CALNENA study, however, did not account for re-bids, and the carrier investigations revealed the limited use of re-bids among the PSAPs in the study. Moreover, during the workshop, one California PSAP involved in the CALNENA study acknowledged that a state agency had instructed the PSAPs *not* to re-bid at one point (a matter that the representative believed would be corrected shortly), and the carrier investigations revealed that only 8 percent of that PSAP's 911 calls were re-bid for Phase II information.³ CTIA and its members have offered to engage with NENA, APCO and PSAPs in further study or re-bid utilization and have suggested guidelines to ascertain clearer results.

It is important to note that many in public safety fully embrace re-bidding to make use of Phase II location information. King County, Washington, the 14th most populous county in the country, is but one example. King County implemented E911 nearly 30 years ago and has been a PSAP leader in E911 policy for many years. In advance of the workshop, King County provided data and explained the challenges associated with E911 location data, noting: “we recognize that today’s wireless 911 location technologies are not perfect” and so “we have prioritized the accuracy of the location above the speed with which the location is delivered.”⁴ As King County noted, “doing a rebid allows the PSAP to obtain the Phase II location that becomes available after the call has been delivered.” King County reported that its percentage of calls with Phase II location was “much higher than what was reported in California,” and the important difference was King County’s rebid policy. Many other PSAPs have made similar findings.⁵

I congratulate the Commission on a very successful workshop. As PSAP and wireless carrier representatives noted, the workshop’s focus was not on “finger pointing” but on a productive dialogue to improve use of the location data available today and to advance location accuracy going forward. One PSAP representative (a former APCO president) announced during the workshop that, as a result of the carrier presentations, he would modify his PSAP’s re-bidding protocols to add a few more seconds to obtain as accurate location data as possible.⁶ The workshop revealed a number of promising issues for collaboration. By recognizing the

³ See Video Transcript from FCC Nov. 18 E911 Workshop, Remarks by Deputy Director, Division of Emergency Communications, Department of Emergency Management, City & County of San Francisco.

⁴ King County, Washington Ex Parte Letter, PS Docket No. 07-114 (Sept. 25, 2013).

⁵ See e.g., Bexar Metro 911 Network District (Texas) Ex Parte Letter (Sept. 19, 2013).

⁶ See Video Transcript from FCC Nov. 18 E911 Workshop, Remarks by Director of Emergency Communications, York-Poquoson-Williamsburg ECC.

challenges of location fixes in a mobile environment, and by improving stakeholder communications and understanding at the ground level, I believe we can identify meaningful solutions to continue to enhance wireless caller location data and the safety of consumers.

Again, thank you for your leadership on E911 and CTIA looks forward to working with you on this and other public safety issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve", written in a cursive style.

Steve Largent