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Public Comments on Wireless E911 Location Accuracy Requirements:=====

Title: Wireless E911 Location Accuracy Requirements

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Comment: I am not an expert on these matters but the following provisions make sense to me and I think you should include them in your guidelines:

CMRS providers would be required to provide horizontal location (x- and y-axis) information within 50 meters of the caller for 67 percent of 911 calls placed from indoor environments within two years of the effective date of adoption of rules, and for 80 percent of indoor calls within five years.

CMRS providers would be required to provide vertical location (z-axis) information within 3 meters of the caller for 67 percent of indoor 911 calls within three years of the adoption of rules, and for 80 percent of calls within five years.

As is the case of our existing E911 location rules, CMRS providers would be required to meet these indoor requirements at either the county or PSAP geographic level.

CMRS providers would demonstrate compliance with indoor location accuracy requirements through participation in an independently administered test bed program modeled on the indoor test bed administered by the Communications Security, Reliability, and Interoperability Council (CSRIC), but providers would have the option to demonstrate compliance through alternative means so long as they provide the same level of test result reliability.

PSAPs would be entitled to seek Commission enforcement of these requirements within their jurisdictions, but only so long as they have implemented location bid/re-bid policies that are designed to obtain all 911 location information made available by CMRS providers pursuant to our rules.

Regards,

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