International Association of Chiefs of Police
National Sheriffs' Association

May 12, 2014

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

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

The International Association of Chiefs of Police (IACP) and the National Sheriffs' Association (NSA) together file this letter in support of the Commission's proposal to update its wireless indoor location accuracy rules.[1] As representatives of professional law enforcement, IACP and NSA are strong advocates for constantly improving the standard of policing and public safety.[2] We are therefore pleased that the Commission's years of dedicated work on this issue appear to be poised to produce concrete improvements in the safety and security of the public, and we urge the Commission to implement the proposed rules as soon as possible.

The paradox of modern emergency response is that it is now easier than ever for victims and bystanders to reach 911, but harder than ever for responders to locate a caller. As representative of police, fire, and other emergency services have already confirmed at length, most 911 calls are from mobile phones, usually indoors, where existing location systems are least able to provide accurate results.[3] The automatic determination and transmission of caller location information is not a backup or an additional feature of the E911 system; it is a core functionality. Long experience teaches us that individuals facing an emergency may be too frightened, distracted, or in shock to properly convey location information. In other cases, they may be physically unable to speak due to an imminent threat or medical condition.[4] As a result, the lack of wireless indoor accuracy requirements represents a significant gap that unacceptably hinders effective response.

Although IACP and NSA urge the Commission to adopt indoor location accuracy rules at the earliest feasible time, we caution that the requirements must be sufficiently specific to provide useful, "actionable" information to first responders. The proposed requirement of location accuracy within 50 meters for indoor wireless calls will provide a marked improvement over the current information available for indoor wireless callers. The Commission correctly recognizes, however, that a radius of 50 meters is effectively the largest area that can be expected

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[1] Wireless E911 Location Accuracy Requirements, FCC 14-13, PS Docket No. 07-114 (Feb. 21, 2014).

[2] The IACP is a worldwide organization of more than 22,000 members that serves as the professional voice of law enforcement. The NSA represents the 3080 Sheriffs of the United States and advocates for policies that will improve the quality of service to their constituents.

[3] F*NPRM*, ¶ 22 note 49.

[4] The survey results of the FindMe911 Coalition provide representative examples of some of the innumerable circumstances in which insufficient indoor location accuracy can limit or even preclude effective police response. Comments of the FindMe911 Coalition, PS Docket No. 07-114 (Apr. 28, 2014) (available at http://apps.fcc.gov/ecfs/document/view?id=7521100379).

to be useful for locating callers indoors.[5] Larger search rings may encompass whole city blocks or apartment complexes, severely limiting the value of the location information to responding officers.[6] IACP and NSA therefore encourage the Commission to consider 50 meters as the maximum radius that would serve the needs of public safety, and to refrain from considering requirements that would not meet or improve upon the current proposal of 50 meter accuracy for 67 percent of calls within two years and 80 percent of calls within five years.

IACP and NSA also strongly support the Commission's inclusion of z-axis requirements in the proposed rules. In urban environments, the vertical dimension is just as much a part of an incident location as the horizontal dimension. Officers at the right address but without a floor number may be little more effective than officers at the wrong address.[7] Thus, IACP and NSA concur that any indoor location accuracy requirement must include vertical location of "near floor level" accuracy to provide useful information for first responders. Since first responders' own equipment can be expected to also have altitude information, they should able to make effective use of this information even if it has not been translated into specific floor numbers.

Improved indoor location accuracy doesn't benefit only the public; it may also help keep first responders safe. The same location technology that makes civilian handsets compliant with the Commission's rules can be installed in the equipment of police, fire, and medical professionals to enable dispatchers and incident commanders to monitor their location. For police officers and sheriffs, accurate real-time location information indoors and out can help increase an officer's safety by locating an injured officer or directing backup to an officer that is unable to verbally communicate his or her location.

IACP and NSA believe that the many commercial location services that are under development may be able to supplement—but cannot substitute for—a federally-mandated dedicated emergency location capability.[8] Location systems capable of satisfying the Commission's requirements must meet rigid compliance criteria, as well as being immediately available for use at all times. Such systems must be dedicated and highly robust; in other words they can't fail if the user has turned off location sensors in his phone to conserve battery, or if there is a power outage or the user is not located in a highly commercialized area. We support any efforts to overcome the current limitations of indoor location accuracy, but cannot support any proposals that would offload critical functions to opt-in or voluntary systems.

It is vital that the Commission press forward with indoor location accuracy rules now, otherwise this important service will continue to be delayed. To the extent that any further development is required to meet the Commission's proposed rules, it will proceed more quickly and more certainly in the face of a regulatory timetable than if left to the same market pressures that have, over the past decade, lagged further and further behind the real-world needs of the public and of public safety. IACP and NSA agree that the Commission's proposed rules will

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[5] *FNPRM*, ¶ 45.

[6] *NPRM*, ¶ 10 (noting that "indoor incidents may not be visible to first responders, and a location accuracy of 100/300 meters … would only identify the city block in which a building is located").

[7] *NPRM*, ¶ 73 (citing comments of CommScope).

[8] *NPRM*, ¶ 127.

dramatically improve the ability of public safety entities to serve consumers in need, and urge the Commission to adopt them as soon as possible.

Respectfully submitted,

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