



P.O. Box 42563 Washington, D.C. 20015-2604

Executive Director
George S. Rice, Jr.
240-398-3065
George.Rice@TheIndustryCouncil.org

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July 14, 2014

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

VIA ELECTRONIC FILING

Re: In The Matter Of Wireless E911 Location Accuracy Requirements, Third Further Notice Of Proposed Rulemaking, P.S. Docket No. 07-114

Dear Ms. Dortch:

The Industry Council for Emergency Response Technologies (“iCERT” or “Industry Council”)¹ respectfully submits the following reply comments in connection with Third Further Notice of Proposed Rulemaking (“FNPRM”) released by the Federal Communications Commission (“FCC” or “Commission”) designed to improve the accuracy of location information associated with wireless 911 calls. iCERT commends the Commission for this crucial initiative. Locating 911 callers is a matter of great importance that requires the attention of all stakeholders. iCERT strongly supports the FCC’s commitment to save lives through the development of E911 solutions that provide accurate location information, regardless of whether a call originates indoors or outdoors.

iCERT believes that the Commission’s review of this next phase in the deployment of E911 should start by clearly articulating its ultimate goal. While the FNPRM recommends adoption of a 50-meter accuracy requirement for 911 calls made from indoor locations, it also states that the Commission’s long-term indoor location objective is “the delivery of ‘dispatchable address’ information, including the caller’s building address, floor level, and suite/room number.”² This statement is significant because it aligns the Commission’s long-term objective with the shift that is already occurring in the emergency communications industry - - away from pure improvements in technology targeting a more precise way to plot x,y coordinates and toward leveraging of alternative technologies and devices such as those used in connection with “address of association;” wireless network access points; Bluetooth beacons; and the commercial location-based services (LBS) market. These alternatives are less costly to deploy in the 911 environment, given the economies derived from use in markets adjacent to public safety, and they are immediately more adaptable for the delivery of a dispatchable address.

Public safety commenters, while supportive of the Commission’s proposed indoor location rules, also recognize that a dispatchable address is the “gold standard” for 911 location accuracy and support the Commission’s recommendation that this be the long term objective.³ Industry comments also highlight the benefits of a dispatchable address. As Intrado states, there is very high value in location information that is accurate enough to allow first responders to know the caller’s exact location in terms of “which door to kick in” to render assistance.⁴ In fact, industry comments go further to suggest that the extensive deployment of WiFi, Bluetooth, and other wireless technologies may actually facilitate the provision of a dispatchable address in a significantly shorter timeframe than the Commission anticipates.⁵

Given the consensus view that the delivery of a dispatchable address is the ultimate goal for indoor 911 calls and the fact that significant developments have already occurred in this area,⁶ iCERT believes that the Commission should clearly articulate the development of dispatchable address solutions as the principle objective of this proceeding and it should establish a policy framework that best achieves that goal. In doing so, however, the Commission should not overlook the benefits associated with continued advancements in the delivery of location information based on latitude/longitude, especially in the near term while dispatchable address solutions are being developed. The Industry Council recognizes the value of 911 location information based on such metrics, and we expect improvements in that area to continue. The Commission’s actions in this proceeding should seek to promote continued advancements in both areas, where possible. However, where resources may be constrained, iCERT recommends that the Commission favor a framework that provides the greatest benefit to public safety over the long term.

Once the Commission has established its ultimate goal in this proceeding, it should establish the policy framework that most effectively achieves that goal. In order to address the issue most effectively, iCERT agrees with NENA that a balance of interests is a must and that “...current and future advances in positioning technology must accrue both to the financial benefit of the carriers and to the safety of the public.”⁷ iCERT believes that this balance can best be achieved through a collaborative effort between industry and the public safety community. The effectiveness of such collaboration can be seen in the important achievements of the CSRIC and in the development of a voluntary agreement to advance the implementation of text-to-911 solutions. Advancement of the Commission’s public policy goals through such collaboration is often preferable to the imposition of new regulatory mandates because it may enable those goals to be achieved more quickly. That is especially true where technologies are rapidly evolving and when alternative approaches are already beginning to emerge in the marketplace.

While iCERT favors a collaborative, market-based approach, the establishment of such a framework cannot take precedence over the need to provide first responders with timely and accurate location information for all 911 calls, including calls made from indoor locations. Consequently, if such a framework proves to be unworkable or fails to result in the provision of the critical information needed by PSAPs, then the Commission would have no choice but to impose new regulatory requirements.

The Commission has also asked for comments on public safety’s desire for “confidence and uncertainty” (C/U) data and the potential for standardizing the manner in which that information is provided to PSAPs. Some public safety agencies have admitted that such data may not always be useful because it is provided in varying forms by different carriers⁸ and that not all PSAPs use C/U data.⁹ The inquiry includes whether the Commission should mandate the ATIS Emergency Services Interconnection Forum *90% confidence-level standard*.¹⁰

iCERT supports the principle of call takers and first responders having life-saving information where it is shown to be necessary and widely used. iCERT further supports the view that a calculated location of a caller must present some form of information that allows the call taker to determine the trustworthiness of that calculated location, and the standardization of how that information is presented to the call taker could reduce confusion and improve the trustworthiness of that data. As the technologies and methods used to provide location information continue to evolve, the use and correlation of uncertainty with actual call location accuracy will need further study

and could be part of the responsibilities of a test bed established for testing the accuracy, whether indoor or outdoor, of location technology. Alternative methods for determining a location fix, especially those providing a dispatchable address, should be both allowed and encouraged; and any methods presented to the Commission which involve providing a trusted dispatchable address associated with the specific 9-1-1 call should determine how the uncertainty associated with such a call would be represented.

iCERT believes that the Commission should quickly declare its ultimate goal in this proceeding and then take actions to promote constructive collaboration between industry and the public safety community that would help achieve that goal, including efforts undertaken by CSRIC. This would be an effective means to promote the development and implementation of E911 location solutions including dispatchable address solutions that would create the greatest long-term benefits for public safety. iCERT recommends that the Commission favor a market-based approach that would continue to rely on CSRIC and industry-public safety collaboration to advance the development of location solutions, and only revert to regulatory mandates when such an approach proves unworkable. The development of voluntary arrangements for improving E911 location accuracy would help the Commission achieve its objective more quickly, and iCERT believes such arrangements should be structured to ensure they meet the following critical objectives:

Provide first responders with meaningful and actionable location information from calls made both indoors and outdoors including delivery of a dispatchable address;

Promote investment in solutions that have long term viability, that leverage investment in adjacent technologies and markets, and preserve precious investment dollars by avoiding expenditures that produce limited results over time;

Promote solutions that are technically feasible, commercially viable, and are based on accepted industry and public safety standards and practices;

Establish timelines that are practical and achievable with action items that are specific and predicated on verifiable data and clear milestones;

Recognize the important roles that each participant in the emergency communications ecosystem plays (vendors, carriers and public safety agencies) and ensure that action items are commensurate with those roles; and

Remain flexible enough to make adjustments over time relative to policy goals and proposed rulemaking in accordance with the changes in technology, the broader communications market and emergency communications needs.

iCERT commends the Commission for its diligence in advancing reliable emergency communications for the nation's citizens, residents and visitors, and offers its expertise should the Commission seek it.

Respectfully submitted,



George Rice
Executive Director

¹ Established by a group of prominent business leaders in December, 2005 originally as the 911 Industry Alliance, iCERT plays an important role as the voice of commercial public safety companies, wireless carriers, and related vendors on public policy issues impacting 911 and the emergency response system. iCERT's membership is diverse, and many of its members not only have differing business objectives, they may be direct competitors. All of iCERT's members agree that an invigorated vendor community engaged in frequent two-way dialog with public safety officials, regulators and policy makers is indispensable to creating the highest quality emergency services for all Americans. Industry Council members believe history has demonstrated that business leaders' expertise can assist public policy makers and government emergency communications professionals as they address complex choices regarding advanced communications technologies. *See*, <http://www.theindustrycouncil.org/index.cfm>

² FNPRM, paragraph 50.

³ Comments of the National Emergency Number Association, p. 18.

⁴ Comments of Intrado, pp. 3-4.

⁵ Comments of Cisco Systems, Inc., p. 4; see also Comments of Intrado Inc., pp. 5-12.

⁶ *See also*, Comments of Cisco Systems, Inc., pp. 3-4.

⁷ Comments of the National Emergency Number Association, p. 17.

⁸ FNPRM, paragraphs 152-154.

⁹ FNPRM, paragraphs 155-158.

¹⁰ FNPRM, paragraph 156.