

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
)
Wireless E911 Location Accuracy) PS Docket No. 07-114
Requirements)
)
)

**REPLY COMMENTS OF
THE NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL**

The National Public Safety Telecommunications Council (NPSTC) submits these Reply Comments in response to the Commission’s Third Further Notice of Proposed Rulemaking in the above-captioned proceeding.¹ In these reply comments, NPSTC reaffirms its support of the Commission’s proposal to establish accuracy requirements for E911 calls made from indoor locations. While technology can undoubtedly advance and provide even greater location accuracy as time goes on, NPSTC does not believe that is a rationale to delay the proposed implementation of 911 location accuracy metrics. As noted in the NPSTC Comments submitted May 12, 2014, both the public and public safety will benefit from the Commission’s proposal and from follow-on further improvements in the technology over time.

The National Public Safety Telecommunications Council

The National Public Safety Telecommunications Council is a federation of public safety

¹In the Matter of Wireless E911 Location Accuracy Requirements, *Third Further Notice of Proposed Rulemaking* in PS Docket No. 07-114, released February 21, 2014.

organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. NPSTC has promoted implementation of the Public Safety Wireless Advisory Committee (PSWAC) and the 700 MHz Public Safety National Coordination Committee (NCC) recommendations. NPSTC explores technologies and public policy involving public safety telecommunications, analyzes the ramifications of particular issues and submits comments to governmental bodies with the objective of furthering public safety telecommunications worldwide. NPSTC serves as a standing forum for the exchange of ideas and information for effective public safety telecommunications.

The following 15 organizations participate in NPSTC:

- American Association of State Highway and Transportation Officials
- American Radio Relay League
- Association of Fish and Wildlife Agencies
- Association of Public-Safety Communications Officials-International
- Forestry Conservation Communications Association
- International Association of Chiefs of Police
- International Association of Emergency Managers
- International Association of Fire Chiefs
- International Municipal Signal Association
- National Association of State Chief Information Officers
- National Association of State Emergency Medical Services Officials
- National Association of State Foresters
- National Association of State Technology Directors
- National Emergency Number Association
- National Sheriffs' Association

Several federal agencies are liaison members of NPSTC. These include the Department of Homeland Security (the Federal Emergency Management Agency, the Office of Emergency Communications, the Office for Interoperability and Compatibility, and the SAFECOM Program; Department of Commerce (National Telecommunications and Information Administration);

Department of the Interior; and the Department of Justice (National Institute of Justice, CommTech Program). In addition, Public Safety Europe is also a liaison member. NPSTC has relationships with associate members, the Telecommunications Industry Association, the Canadian Interoperability Technology Interest Group, the National Council of Statewide Interoperability Coordinators, the Utilities Telecom Council, and the Alliance for Telecommunications Industry Solutions.

NPSTC Reply Comments

In response to the growing need for 911 location accuracy including calls made from indoors, the Commission has proposed the following near-term and longer-term location accuracy metrics:

- 50 meter horizontal axis accuracy for 67% of 911 indoor calls within 2 years of rule adoption, increasing to 80% at 5 years
- 3 meter vertical axis accuracy for 67% of 911 indoor calls within 2 years of rule adoption, increasing to 80% at 5 years

In Comments submitted in this proceeding on May 12, 2014, NPSTC expressed its support for the Commission's proposal to bring more focus on indoor location accuracy:

Specification of location accuracy metrics is important for both the vertical and horizontal axes, and NPSTC congratulates the Commission on including both components in its proposal. It appears the industry continues to make significant progress toward location accuracy for both the vertical and horizontal components and that additional improvements are on the horizon. Therefore, NPSTC urges the Commission to resist any attempts to reduce or delay the proposed accuracy levels unless evidence emerges in this proceeding that the metrics absolutely cannot be met in the timeframe required.²

NPSTC also noted the potential benefits of leveraging wireless indoor location accuracy technology to help provide location information on first responders, as well as location information to

² NPSTC Comments at page 4.

first-responders. The ability to locate firefighters, law enforcement personnel, and emergency medical personnel when they respond to an incident indoors and need assistance would be invaluable.

NPSTC respects the many complexities involved in developing and deploying the technology to provide accurate wireless 911 indoor location information. The record in this proceeding is extensive in addressing those complexities. However, the overall goal is clear—provide accurate indoor location information without undue delay.

NPSTC also understands the technology will undoubtedly improve over time, but does not believe that is a reason to delay starting down the path toward indoor location accuracy metrics. The wireless industry has been very adept at transitioning from 2G to 3G to 4G technologies, with each successive iteration providing benefits to the public and the wireless industry. Similarly, NPSTC urges the Commission to set a path upon which the wireless industry can provide as accurate as possible wireless indoor location information in the near-term, while looking forward to further improvements in location accuracy as they become available.

Conclusion

In summary, NPSTC reaffirms its support of the Commission's proposal to establish indoor location accuracy requirements for E911 calls made from indoors with a timetable for implementation. In addition to locating members of the public making 911 calls from wireless devices, the continued refinement of wireless indoor location technology should provide location mechanisms which also can be leveraged to help locate first responders in need of assistance.

Respectfully submitted,



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