ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-INTERNATIONAL
NATIONAL EMERGENCY NUMBER ASSOCIATION

July 14, 2008

Chief Derek Poarch
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20552

Re: PS Docket 07-114 and CC Docket 94-120

Dear Chief Poarch:

The Association of Public-Safety Communications Officials, International (APCO) and the National Emergency Number Association (NENA) thank you and your colleagues for continued leadership on public safety matters, specifically wireless E9-1-1. Today, we submit this letter to report to you the work that has been ongoing since the FCC released its Order addressing the location of individuals placing 9-1-1 calls from their wireless devices.

We have previously advocated that wireless E9-1-1 accuracy should be measured at the PSAP level. We are now willing to accept compliance measurements at the county level. In part, this reflects the changes that are occurring in the PSAP community, as some communities are consolidating 9-1-1 centers, and others are changing PSAP geographic boundaries to match county boundaries. Counties, unlike PSAP service areas, also reflect a stable geographic area and would be a more appropriate regulatory criteria.

The FCC should maintain the current Phase II E9-1-1 metrics for 67% of calls, location accuracy within 50 meters for handset location solutions and 100 meters for network location solutions. However, both APCO and NENA agree that it may be appropriate to make adjustments to the current requirement that 95% of wireless E-9-1-1 Phase II calls be accurate within 150 meters for handset location solutions and 300 meters for network location solutions. We recognize that satisfying this requirement at a PSAP or county level is especially difficult for many carriers due to variations in geography and system deployments. Thus, the Commission may want to consider either reducing the percentage of 9-1-1 calls from 95% or increasing the 150/300 meter metrics.

We also recognize that it may not be technically feasible for carriers to meet the modified location accuracy requirements in every county. Therefore, the FCC should establish a waiver process with clear guidelines and procedures. For such waivers, the Commission should identify factors for consideration such as technical limitations, whether the carrier is meeting network optimization criteria and whether it is maintaining state-of-the-art capabilities for its chosen location technology. In the event that a carrier seeking a waiver proposes to select a different location technology, the Commission should consider whether there is a clearly defined plan to improve location accuracy.

Public safety and wireless carriers are in current discussions on a number of other issues associated with E9-1-1, with the goal of improving information available to PSAPs. There are areas of agreement in concept; however, the details are still being developed. These include:

- **Providing more uniform uncertainty values through a standard confidence factor**: The goal is to provide PSAPs with the most accurate and highest quality E9-1-1 location information possible with existing positioning equipment, while providing consistent interpretation of the results from diverse carriers and technologies. A wireless carrier's uncertainty estimates under this proposal will therefore provide a real-time, per call estimate of the 9-1-1 caller's location, and the uncertainty estimate associated with each Phase II E9-1-1 call should be viewed with roughly the same "confidence", regardless of carrier.

- **Indoor testing**: A working group of public safety and wireless carriers, vendors and other experts should be established to develop the specifics of indoor testing.

- **Next Generation Issues:** A working group of public safety and wireless carriers and others as needed should be established to examin**e** advances in both wireless servi**c**es and PSAP call centers, with the goal of ensuring that advances in wireless and location technologies have the corresponding capability to transmit voice and data services in a usable format for PSAPs. Examples include: femtocell or access point technologies, next generation GPS satellite technology, IP platforms and PSAP access for the delivery of voice, video and data location information.

Public safety and wireless carriers continue to meet to address these issues. The key point of this letter to put on record our opinion that in light of the changes occurring both in the PSAP and wireless communities, E9-1-1 location accuracy should be determined at the county level. We are hopeful that in the very near future we, perhaps in concert with the wireless industry, can provide you with greater details on assessing wireless carrier compliance at the county level as well as more details on the concepts mentioned above.

Again, thank you for your commitment to public safety and the importance of E9-1-1.

Respectfully,

Willis Carter, President
APCO International

Ronald Boneau, President
NENA