

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

In the Matter of	)	
	)	
	)	
Framework for Next Generation 911 Deployment	)	PS Docket No. 10-255
	)	
	)	
	)	

To: The Commission

**JOINT COMMENTS OF
INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE
INTERNATIONAL ASSOCIATION OF FIRE CHIEFS
NATIONAL SHERIFFS' ASSOCIATION**

The International Association of Chiefs of Police (IACP), the International Association of Fire Chiefs (IAFC), and the National Sheriffs' Association (NSA), (collectively “IACP-IAFC-NSA”), on behalf of their members, hereby jointly submit these comments in the above referenced proceeding, in which the Commission seeks information to address how Next Generation 911 (“NG911”) can enable the public to obtain emergency assistance by means of advanced communications technologies beyond traditional voice-centric devices..¹

The IACP is an organization of more than 20,000 professionals responsible for administration of local, tribal, state and federal law enforcement agencies within the United States and throughout the world. The IAFC represents the leadership of over 1.2 million firefighters and emergency responders. IAFC members are the world's leading experts in firefighting, emergency medical services, terrorism response, hazardous materials spills, natural

¹ Notice of Inquiry (“NOI”), PS Docket No. 10-255, FCC 10-200, released December 21, 2010 [76 FR 2297, January 13, 2011].

disasters, search and rescue, and public safety legislation. The NSA is an organization of more than 21,000 members that are dedicated to supporting programs that enable sheriffs, their deputies, chiefs of police, and others in the field of criminal justice to perform their jobs in the best possible manner and to better serve the people of their counties/cities or jurisdictions.

Collectively, these organizations include many of the key decision makers in the United States Public Safety Community.

The “IACP-IAFC-NSA” works closely with the Association of Public-Safety Communications Officials-International (APCO) in regards to 9-1-1 issues and we were afforded the opportunity to review the comments that are being filed by APCO in this proceeding and we support those comments.

NG911 promises to bring new capabilities to the public safety community and the public we serve, but it is not without some significant challenges and we welcome the opportunity provided by the Federal Communications Commission (FCC) to comment in this important proceeding.

Four very important focuses of NG911 are:

1. Capability of the public to send text messages, photos and video to 9-1-1 Public Safety Answering Points (PSAPs). That capability is not possible today and is of great importance to public safety to enable them to better perform their duties and responsibilities.
2. Capability of PSAPs to exchange text messages, photos and video among other PSAPs, and to forward such information to another PSAP of jurisdiction when it is incorrectly received by the wrong PSAP. That capability exists in very few PSAPs today and is also of great importance to public safety.

3. Capability to transmit and receive wireless broadband data with public safety field personnel. We are encouraged that this will be accomplished by the implementation of the proposed 700 MHz nationwide public safety wireless broadband network. The public safety community is united in its support of implementing new broadband technology based on the commercial Long Term Evolution (LTE) standard and looks forward to the reallocation to public safety of the 700 MHz D block spectrum so sufficient broadband capacity can be made available for public safety to improve interoperability and provide advanced data services to public safety responders.
4. Capability to identify the location of 911 callers and public safety personnel so that public safety responders can promptly respond to their location when they are in trouble and need prompt assistance from public safety personnel. With Americans growing reliance on wireless services, there is a significant and growing need for accurate outdoor and indoor location capability. An increasing concern is that a large percentage of wireless 911 calls from the public are made indoors where GPS satellite signals are not reliable, causing significant risk that the location of 911 callers and public safety personnel will not be available to a large portion of the population and public safety personnel at any given time. We note favorable technology trends and emerging approaches which hold the promise of significant improvements in location accuracy and availability. We believe the FCC should adopt accuracy and indoor availability guidelines which improve significantly over time in order to support the continued adoption of these technologies as they

become available, and to support the pressing public safety need for reliable, accurate location capabilities in an urban and indoor environment.

The “IACP-IAFC-NSA” also works closely with the Alarm Industry Communications Committee (AICC) and has been afforded the opportunity to review the comments being filed by the AICC.

In the comments filed by the AICC, they call attention to issues of great importance to public safety, and the “IACP-IAFC-NSA” agree with AICC’s concerns. We urge the Commission to look closely at the following issues in those comments:

1. The direct transmission of alarm signals from off-the shelf devices to PSAPs could overwhelm state and local emergency response capabilities.
2. Direct alarm signals can flood a PSAP, making it impossible to respond to legitimate emergencies.
3. Allowing direct connection of all IP enabled alarm devices to PSAPs would expose public safety to “autodialer” problems.
4. False signals could effectively shut down PSAPS, if unscreened alarm signaling is allowed.
5. Proposals to allow security cameras to directly connect with PSAPs raise concerns for public safety.
6. PSAPs should not be bombarded with 911 signals from televisions, iPods and gaming consoles.
7. The Commission should not allow direct 911 calls from consumer alarm systems, security cameras and entertainment devices.

The "IACP-IAFC-NSA" applauds the Commission for soliciting comment on this very important public safety matter.

We urge the Commission to give strong consideration to our comments and the comments filed by APCO and the AICC that are being filed in response to this proceeding.

Respectfully submitted,

INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE

Chief Mark Marshall, President
515 N. Washington St.
Alexandria, VA 22314-2357

INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

Chief Jack Parow, President
4025 Fair Ridge Drive
Fairfax, VA 22033-2868

NATIONAL SHERIFFS' ASSOCIATION

Sheriff B. J. Roberts, President
1450 Duke Street
Alexandria, VA 22314-3490

Contact: Harlin R. McEwen
Chair - IACP Communications Committee
422 Winthrop Drive, Ithaca, NY 14850
E-Mail: chiefhrm@pubsaf.com
607-227-1664

Alan Caldwell
Senior Advisor, IAFC
4025 Fair Ridge Drive
Fairfax, VA 22033-2868
E-Mail: acaldwell@iafc.org
703-537-4809

Stephanie Garlock
NSA Director of Government Affairs
1450 Duke Street
Alexandria, VA 22314-3490
E-Mail: sgarlock@sheriffs.org
703-838-5316

February 28, 2011