

May 4, 2018

Chief Lisa M. Fowlkes
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th St SW
Washington, DC 20554

RE: PS Docket No. 07-114

Dear Chief Fowlkes:

We are writing today with an ongoing concern about how the wireless industry is interpreting “dispatchable location” for 9-1-1 location accuracy purposes, within the framework of the FCC’s Fourth Report and Order.¹ As defined by the Commission, dispatchable location means “the verified or corroborated street address of the calling party plus additional information such as floor, suite, apartment or similar information that may be needed to adequately identify the location of the calling party.”² With this information in hand, 9-1-1 professionals can help direct field responders to the scene of the emergency and enable them to provide life-saving assistance more quickly.

Under the FCC’s rules, wireless carriers must provide a dispatchable location or a horizontal fix in the x,y plane within 50 meters for increasing percentages of all wireless 9-11 calls.³ Therefore, a carrier seeking to comply with these benchmarks by providing a dispatchable location may only do so if the location it provides to PSAPs meets the FCC’s definition of dispatchable location. For example, if a Wi-Fi access point is located across the street in a different building, carriers may not describe the physical address of this access point as being the “dispatchable location” of the calling party. Any related definitions resulting from the industry’s standards development activities such as through ATIS cannot be used to depart from the FCC’s definition of dispatchable location for regulatory compliance purposes. Consistent with the Order, to be counted towards compliance, a location fix described by a carrier as a “dispatchable location” must be “which door to open” when assistance is required and nothing less.

¹ Wireless E911 Location Accuracy Requirements, *Fourth Report and Order*, PS Docket No. 07-114, 30 FCC Rcd 1259 (2015).

² *Id.* at para. 44. See also 47 C.F.R. § 20.18(i)(1)(i): “*Dispatchable location*: A location delivered to the PSAP by the CMRS provider with a 911 call that consists of the street address of the calling party, plus additional information such as suite, apartment or similar information necessary to adequately identify the location of the calling party. The street address of the calling party must be validated and, to the extent possible, corroborated against other location information prior to delivery of dispatchable location information by the CMRS provider to the PSAP.”

³ 47 C.F.R. § 20.18(i)(2)./s/

We understand that the Bureau has indicated agreement in the past that for compliance purposes, carriers must abide by the FCC's definition of dispatchable location. As implementation of the Order continues, we respectfully request the Bureau to provide a formal response reemphasizing the definition of dispatchable location, to ensure that all carriers subject to this requirement understand and comply with the meaning and intent of this critical element of the Order.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph Haller", with a long, sweeping horizontal flourish extending to the right.

Ralph Haller, NPSTC Chair