July 8, 2020

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

Re: Wireless 911 Location Accuracy
PS Docket No. 07-114

By: Electronic Filing

Dear Ms. Dortch:

The National Public Safety Telecommunications Council (NPSTC) expresses its support for the adherence of the recently released draft *Sixth Report and Order* to the vertical location accuracy requirement that was previously adopted by the Commission mandating that wireless carriers provide z-axis location information to public safety that is accurate within +/- 3 meters for at least 80% of calls to 911. The public safety community has clearly indicated that 3 meter accuracy is the minimum threshold necessary to reliably locate wireless callers in distress. Further, the provision of +/- 3 meter accuracy for anything less than 80% of calls from z-axis capable handsets would be insufficiently accurate to be useful as actionable information to support first responders in the field.

NPSTC does not support suggestions that the Commission should wait any further for the identification and verification testing of additional or improved location technologies, or for
a reduction in the prevalence of the COVID pandemic. The general public and public safety have already waited far too long for the provision of highly accurate location information with wireless calls to E911 emergency services.

To put the proposed *Sixth Report and Order* in perspective, the Commission first identified the need for vertical location information to support wireless calls to E911 in 1994. However, the issue was deferred until 2013 when, based on favorable analysis from the Communications, Security, Reliability and Interoperability Council, the Commission proposed requiring carriers to implement by 2020 a requirement for +/- 3 meter accuracy for 67 percent of wireless calls to E911. This proposal was forestalled by the carrier’s proposal for a National Emergency Address Database, which the carriers eventually abandoned.

The carriers also proposed a z-axis metric of +/- 5 meters, which was rejected by both public safety and the Commission. Instead, a vertical metric of +/-3 meters for 80% of calls was finally adopted last year. Now, wireless carriers want to defer this requirement for another 5 years (10 years after the Commission’s first adoption of a vertical location requirement in 2015). The Commission should again reject these stalling measures through adoption of its *Sixth Report and Order*.

NPSTC also strongly supports the Commission’s decision to expand its wireless location accuracy requirements to require that z-axis data be provided nationwide by April 2025. Mandating nationwide coverage should not be burdensome for wireless carriers given the fact that multiple location technology vendors, including Apple, Google NextNav and Polaris have indicated that their services either already are, or soon can be, made available on a nationwide basis.
The near-term availability of +/- 3 meter accuracy vertical location services will greatly assist first responders who are the feet on the street responding to a call for help. Timing is key in a life or death situation in answering and responding to a 911 call. Expeditious arrival of first responders requires that they have accurate information on the location where assistance is needed. For multi-story buildings, that not only requires the location of the building, but also the floor level where the victim is located.

Given the importance of highly accurate vertical location information, NPSTC also urges the Commission to revise its draft order to take further steps to ensure there are continual improvements in vertical location accuracy. For example, NPSTC strongly supported tightening the vertical metric to 2 meters, or even 1 meter if possible, in the relatively near future. As NPSTC has previously observed, at least one location technology vendor has already demonstrated accuracy of better than 2 meters, indicating that the timeframe required for tightening the requirement may not be lengthy. Thus, to facilitate the rapid implementation of more accurate capabilities, the Commission should consider establishing additional milestone dates by which 2 meter accuracy will be required, potentially following the current 3 meter milestones by two or three years.

NPSTC also urges the Commission to take further steps to require the wireless industry to identify and implement location technologies that reliably provide the floor label of the caller, for the vast majority of wireless calls to public safety answering points. We do applaud the Commission for requiring floor or address information whenever that information is available. But it would be more helpful if the Commission made clearer when carriers are expected to provide floor labels. Similarly, with respect to dispatchable location, rather than limiting the requirement to when it is “technically feasible and cost-effective,” the Commission
should establish minimum percentage thresholds for dispatchable location. The provision of the
correct floor information, potentially coupled with the identity of the exact door to which public
safety needs to respond, would vastly improve the resources that are available to emergency
first responders.

NPSTC again thanks the Commission for its focus on 911 location accuracy and urges
the adoption of rules that benefit public safety and the general public it serves.

Ralph A. Haller, Chairman

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