



# INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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July 14, 2014

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW, Room TW-A325  
Washington, DC 20554

RE: PS Docket No. 07-114, Wireless E911 Location Accuracy Requirements; Reply Comments

Dear Secretary Dortch,

The International Association of Fire Chiefs (IAFC), representing nearly 10,000 fire and emergency services chiefs, files these reply comments to highlight the overwhelming support for the near-term wireless indoor location accuracy rules proposed in the FCC's Third Further Notice of Proposed Rulemaking.<sup>1</sup> The availability of accurate E9-1-1 location information is a fundamental assumption of public safety response, and the proposed rules will ensure essential near-term improvements as well as driving development toward long term goals.

The comments of state, national, and international public safety entities make it clear that rules for improved wireless indoor location accuracy are urgently needed. On behalf of the nation's fire and emergency services chiefs, we have explained that "the deployment of advanced location technologies is critical to the future of emergency calling systems."<sup>2</sup> For law enforcement, "the lack of wireless indoor accuracy requirement represents a significant gap that unacceptably hinders effective response."<sup>3</sup> For the professionals that put themselves at risk to protect the public, the tools must be adequate to the job, and the E9-1-1 system is increasingly unable to perform with the accuracy and reliability required.

Given the clear gap between the demands of public safety and the limitations of the current rules, the FCC is correct to insist on near-term improvements to indoor location accuracy. Far from being a "waste [of] scarce resources,"<sup>4</sup> near-term location accuracy rules are a critical first step to bringing the E9-1-1 system back in line with the needs and expectations of the public and first responders. The FCC has acknowledged the broad position of public safety that "virtually any improvements in indoor location

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<sup>1</sup> Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, Third Further Notice of Proposed Rulemaking, FCC 14-13 (Feb. 21, 2014) ("*FNPRM*").

<sup>2</sup> Comments of the IAFC, PS Docket No. 07-114, at 1 (May 12, 2014).

<sup>3</sup> Comments of the International Association of Chiefs of Police and the National Sheriffs' Association, PS Docket No. 07-114, at 1 (May 12, 2014).

<sup>4</sup> Comments of AT&T, PS Docket No. 07-114, at 6.

capabilities would be desirable, even if relatively modest or incremental.”<sup>5</sup> Thus, we reiterate that the FCC should promptly adopt clear near-term requirements with a reasonable timeline for compliance. These rule changes will ensure that all stakeholders maintain focus on this important issue and will also drive the implementation and improvements necessary to meet the FCC’s long-term objective of ensuring a reliable “dispatchable address” for every 9-1-1 call.<sup>6</sup>

Finally, the FCC should not delay adoption of the rules to wait for still further testing. Test results already in the record show substantial improvements over the untenable status quo as well as continuing development. For example, in August 2013, NextNav filed updated test results of its Metropolitan Beacon System demonstrating improvements over the Communications Security, Reliability and Interoperability Council's results of ten (10) meters or more across dense urban, urban, and suburban morphologies and showing that its technology offered one option for complying with the proposed indoor location accuracy requirement.<sup>7</sup> True Position also recently filed updated test results, which show improvement of tens of meters in the performance of its hybrid AGPS/UTDOA technology and demonstrate that AGPS/UTDOA is another technology available to meet the FCC’s proposed rules.<sup>8</sup> As the Association of Public-Safety Communications Officials-International (APCO) explained in its comments, “the Commission has the statutory authority and obligation to make its own evaluation of technical feasibility and should proceed with rules, including deadlines, if it believes that those rule requirements are appropriate.”<sup>9</sup> Filings like these, as well as several other technologies in development, demonstrate that the proposed rules are feasible and that the FCC has a strong factual record on which to move forward with the proposed rules.<sup>10</sup>

The IAFC wholeheartedly agrees with the comments of the National Public Safety Telecommunications Council (NPSTC) when it states: “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.”<sup>11</sup>

The IAFC in this docket has always set forth some key principles to keep in mind from a public safety standpoint:

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<sup>5</sup> *FNPRM*, ¶ 32.

<sup>6</sup> *FNPRM*, ¶ 117-118.

<sup>7</sup> Letter from Bruce Olcott to Marlene H. Dortch, PS Docket No. 07-114, at 3 (Aug. 14, 2013).

<sup>8</sup> True Position, Indoor Test Report Wilmington, DE at 37-38 (June 18, 2014) (available at <http://www.trueposition.com/assets/Uploads/TP-TestResults-2014.pdf>).

<sup>9</sup> Comments of APCO, PS Docket No. 07-114, at 4 (May 12, 2014).

<sup>10</sup> *See, e.g.* Comments of Polaris Wireless, Inc., PS Docket No. 07-114, at 4 (Jun. 13, 2014) (explaining that “Polaris has repeatedly demonstrated indoor location accuracies of approximately 30-40m across a variety of indoor morphologies”); Reply Comments of iPosi, PS Docket No. 07-114, at 3 (Jun. 11, 2014) (explaining that small cells offer an “an indoor reference frame to reference and range indoor mobiles within the location frame quickly and accurately”).

<sup>11</sup> Reply Comments of the NPSTC, PS Docket No. 07-114, at 4 (July 14, 2014).

- Accuracy of any indoor location technology is important for public safety in both rural and urban environments.
- Location technology must be readily deployable and easy to use for public safety.
- Indoor location technology must be cost-effective for public safety to use. If the technology is not cost-effective, public safety will not be able to afford it.

The IAFC applauds the FCC for its well-considered work to address what we can see as being a key component of effective fire, police, and emergency medical response in the future. We look forward to the adoption of the proposed rules and will continue to work with the FCC as these rules are implemented. Please contact Jim Goldstein, the IAFC's Government Relations and Policy Manager, at 202-494-6607 or [jgoldstein@iafc.org](mailto:jgoldstein@iafc.org), if we can be of assistance on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Mead". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Fire Chief William R. Mead, EFO, CFO, FIFireE  
President and Chairman of the Board

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