

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

In the Matter of)	
)	
Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules)	GN Docket No. 11-117
)	PS Docket No. 07-114
Wireless E911 Location Accuracy Requirements)	WC Docket No. 05-196
)	
E911 Requirements for IP-Enabled Service Providers)	

**Comments of the
International Association of Chiefs of Police
International Association of Fire Chiefs
National Sheriffs' Association
Joint National EMS Leadership Conference**

The International Association of Chiefs of Police (IACP), the International Association of Fire Chiefs (IAFC), the National Sheriffs' Association (NSA) and the Joint National EMS Leadership Conference (JNEMSLC), present these comments responding to the Commission's Further Notice of Proposed Rulemaking examining E911 indoor location accuracy.¹

The E911 rules require wireless carriers to provide 911 Centers the location of an emergency call but currently are not applicable to indoor environments. We urge the Commission to make clear that carriers must provide indoor location information and that there be periodic testing to verify compliance. The lack of indoor accuracy requirements represents a significant gap hindering improved emergency response.

¹ In the Matter of the Definition of Interconnected VOIP Service in Section 9.3 of the Commission's Rules, Wireless 911 Location Accuracy Requirements, E 911 Requirements for IP-Enabled Service Providers, Notice of Proposed Rulemaking, Third Report and Order and Second Further Notice of Proposed Rulemaking, FCC 11-107, GN Docket No. 11-117, PS Docket No. 07-114 and WC Docket No. 05-196 (July 13, 2011).

The Commission notes that the lack of indoor location accuracy to be a significant public safety concern requiring development of indoor technical solutions and testing methodologies to verify the effectiveness of such solutions. While recognizing the importance of indoor testing, the Commission states that it believes work is needed and seeks comment on whether the Commission should require indoor location accuracy testing and, if so, what standards it should use.²

The IACP, IAFC and NSA emphasized in comments addressing NG 911, PS Docket 10-255, that the capability to identify the location of 911 callers and public safety personnel is critical so that emergency service officers can promptly respond to their location when they are in trouble and need assistance. With America's wide reliance on wireless services, there is an enormous and growing need for accurate outdoor and indoor location capability. An increasing concern is the large percentage of wireless 911 calls made indoors where GPS satellite signals are not reliable. Our experience demonstrates the seriousness of this challenge and why the Commission must act to require indoor accuracy standards. JNEMSLC agrees with this position.

The gap in the Commission's current rules between outdoor and indoor location requirements creates a large and real risk that the location of 911 callers is not available to large portions of the population and emergency responders. Favorable technology trends and emerging approaches present a path to meaningful improvements in location information that can make a difference.

It is vital that the Commission pursue without delay indoor accuracy rules and protocols to ensure compliance. Otherwise nothing will happen. Facing an emergency, an individual is perplexed and uncertain, and is frequently unable to communicate their location. Whether

² *Second Further Notice of Proposed Rulemaking* at paragraph 86.

involving multi or single level buildings, knowing that an incident is within a specific area, such as that required for outdoor environments under the Commission's rules, places emergency responders at a much enhanced starting point and reduces significantly the difficulty and time in determining where the emergency is.

With the expanding quantity of devices and wireless technologies, there is a pressing public safety need for reliable, accurate location capabilities in urban and suburban indoor environments, where the need is greatest. Accuracy should be verified by testing real world environments and evaluated in terms of citizen and public safety expectations.

Chairman Genachowski has emphasized that when Americans call 911 from their landlines, first responders receive location information that is accurate more than 98% of the time. When Americans call 911 from their mobile phones, first responders are about 50% less likely to receive precise information about the location. The inaccuracy is not just a few feet, but up to one or two miles—and sometimes there is no location information. As the Chairman notes, precious minutes can be the difference between life and death.³ The Commission is at a critical point; improvements to location accuracy depend on its leadership in establishing defined and improved indoor standards that can be verified by real world testing.

³ Statement of Chairman Genachowski, In the Matter of Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114 and E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196, Further Notice of Proposed Rulemaking and Notice of Inquiry, FCC 10-177 (September 23, 2010) at page 42.

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

Respectfully,

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