

EXECUTIVE SUMMARY

E9-1-1 Indoor Location Accuracy – Response to FCC “Further Notice of Proposed Rulemaking” (FNPRM)

In May, NASEMSO joined NAEMT, NAEMSP and NEMSMA in commenting on this FNPRM (it is “Further” because it has been proposed for years and wireless carriers have been successful in blocking it). We also filed as a part of a National Public Safety Telecommunications Council comment, but felt it was important to have an EMS community response.

This proposed filing, also sent to the other three associations, is a reply to comments received by the FCC during the May proceeding. It is an opportunity to further our arguments.

The FCC is proposing a rule requiring an indoor location accuracy for phones provided by wireless carriers (i.e. cell phones, smart phones) of 50 meters horizontally and 3 meters vertically. This would take the place of the current 150 meter horizontal accuracy requirement and total lack of a vertical requirement (essentially the indoor requirement is now the outdoor requirement). In an urban area, this would generally allow 9-1-1 to give responders a good idea of what building the caller is in and what floor (within two) the caller is on. The technology to do this exists and has been tested, and a number of providers will have it available within the time-frames sought by the FCC.

If you wish to see the whole FNPRM, it may be found at: <http://www.fcc.gov/document/proposes-new-indoor-requirements-and-revisions-existing-e911-rules> .

The attached draft reply comments focus mostly on restating our case, emphasizing similar cases made by other associations and urging the FCC to adopt standards. We do not disparage wireless carriers but explain our perspective on why they don’t want the standards. Simply for full disclosure, much of this draft was compiled by a location accuracy vendor who I consulted because I have known and respected him for years, and our interests are the same in this matter. He is also trusted by my public safety communications colleagues on this matter. Limits on my time resources otherwise would not allow me to plow through all the comments received by the FCC on this Docket.

The deadline was pushed back to July 14.