



PUBLIC NOTICE

Federal Communications Commission
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PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT IN THE E911 LOCATION ACCURACY PROCEEDING ON THE LOCATION ACCURACY “ROADMAP” SUBMITTED BY APCO, NENA, AND THE FOUR NATIONAL WIRELESS CARRIERS

PS Docket No. 07-114

Comment Date: December 10, 2014

Reply Comment Date: December 17, 2014

By this Public Notice, the Public Safety and Homeland Security Bureau (Bureau) seeks comment on the “Roadmap for Improving E911 Location Accuracy” (Roadmap), filed in the E911 Location Accuracy proceeding (PS Docket No. 07-114) by the Association of Public-Safety Communications Officials (APCO), the National Emergency Number Association (NENA), AT&T Mobility, Sprint, T-Mobile USA, and Verizon (Parties).¹

The Roadmap was filed in response to the *Third Further Notice of Proposed Rulemaking* in this proceeding,² in which the Commission proposed measures and timeframes to improve location accuracy for 911 calls originating indoors, including proposals related to horizontal and vertical location of callers.³ The Commission also “encourage[d] industry, public safety entities, and other stakeholders to work collaboratively to develop alternative proposals for our consideration.”⁴ The Parties assert that the Roadmap “marks a new course using indoor technologies to deliver a ‘dispatchable location’ for indoor 9-1-1 calls” and that it “contrasts with current and proposed outdoor technologies that provide estimates of location and face challenges with indoor location accuracy.”⁵ The Parties further state that “the Roadmap commits to meaningful improvements and FCC-enforceable timeframes to deliver effective location

¹ See Letter, John Wright, APCO International, Charles W. McKee, Sprint, Joan Marsh, AT&T Services, Inc., Kathleen O’Brien Ham, T-Mobile USA, Christy Williams, NENA-The 9-1-1 Association, Kathleen Grillo, Verizon, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket No. 07-114 (filed Nov. 18, 2014) (Roadmap Cover Letter), Attachment A, “Roadmap for Improving E911 Location Accuracy” (Roadmap), available at <http://apps.fcc.gov/ecfs/document/view?id=60000986637>.

² Wireless E911 Location Accuracy Requirements, *Third Further Notice of Proposed Rulemaking*, PS Docket No. 07-114, 29 FCC Rcd 2374 (2014) (*Third Further Notice*).

³ *Id.* at 2375-76 ¶¶ 1, 3.

⁴ *Id.* at 2377 ¶ 6.

⁵ See Roadmap Cover Letter at 1.

solutions.”⁶ We also note that some public safety organizations have submitted *ex parte* filings critical of the Roadmap and supportive of the original proposals in the *Third Further Notice*.⁷

While the Commission has already received numerous comments and compiled an extensive record in this proceeding, we believe that seeking expedited comment on the Roadmap is appropriate in light of the important public safety issues addressed in this proceeding and in order to ensure a complete and comprehensive record. Accordingly, we seek comment on whether the Roadmap presents a reasonable alternative, in whole or in part, to the proposals set forth in the *Third Further Notice*. We urge commenters to address the specific elements of the Roadmap and whether the Commission should incorporate each such element in whole, in part, or with modifications, into the rules that it ultimately adopts in this proceeding. We also seek comment on the potential applicability of the Roadmap elements to wireless carriers other than the Roadmap signatories.

Procedural Matters

Pursuant to sections 1.415 and 1.419 of the Commission’s rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission’s Electronic Comment Filing System (ECFS). *See Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <http://fjallfoss.fcc.gov/ecfs2/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.

⁶ *Id.* at 2.

⁷ *See* Letter, Danita Crombach, President, California Chapter of the National Emergency Number Association, R. Craig Whittington, ENP (Retired), National President 2009/2010 National Emergency Number Association, Richard J. Fiesta, Executive Director Alliance for Retired Americans, Angelo Salvucci, MD, FACEP, Emergency Medical Services (EMS) Medical Directors Association of California, Claude L. Stout, Executive Director Telecommunications for the Deaf and Hard of Hearing, Inc., Nancy B. Rarus, President, Deaf Seniors of America, David Litman, President, Association Of Late-Deafened Adults, Cheryl A. Heppner, Vice Chair, Deaf and Hard of Hearing Consumer Advocacy Network, Sheri Farinha, Acting Chair, California Coalition of Agencies Serving the Deaf and Hard of Hearing, Howard A. Rosenblum, Chief Executive Officer, National Association of the Deaf, Mark Gasaway, President, American Association of the Deaf-Blind, Mark Hill, President, Cerebral Palsy and Deaf Organization, PS Docket No. 07-114 (filed Nov. 19, 2014) (Danita Crombach, et al), *available at* <http://apps.fcc.gov/ecfs/document/view?id=60000987166>; Email, Claude L. Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI) to Derek Poarch, Executive Director, APCO, PS Docket No. 07-114 (filed Nov. 19, 2014), *available at* <http://apps.fcc.gov/ecfs/document/view?id=60000987176>; Email, Claude L. Stout, Executive Director, TDI, to Brian Fontes, NENA, PS Docket No. 07-114 (filed Nov. 19, 2014), *available at* <http://apps.fcc.gov/ecfs/document/view?id=60000987171>; Letter, Vincent Talucci, Executive Director and CEO, IACP, Mark W. Light, CAE, Chief Executive Officer and Executive Director, IAFC, Paul R. Patrick, President, NASEMSO, John W. Thompson, Acting Executive Director, NSA, to Thomas Wheeler, Chairman, Federal Communications Commission, PS Docket No. 07-114 (filed Nov. 14, 2014), *available at* <http://apps.fcc.gov/ecfs/document/view?id=60000984332> (IACP Letter). We note that the IACP letter was filed with an alternative proposal. *See* “Comparison of FCC Proposal and IACP, IACF, and NSA Proposal (11/14/2014),” PS Docket No. 07-114 (filed Nov. 14, 2014), *available at* <http://apps.fcc.gov/ecfs/document/view?id=60000984334>.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th St., SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY).

The proceeding this Notice initiates shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.⁸ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (*e.g.*, .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

For further information regarding this proceeding, contact Eric Ehrenreich, Policy and Licensing Division, Public Safety and Homeland Security Bureau, (202) 418-1726, or Dana Zelman, Policy and Licensing Division, Public Safety and Homeland Security Bureau, (202) 418-0546.

The Public Safety and Homeland Security Bureau issues this Public Notice under delegated authority pursuant to Sections 0.191 and 0.392 of the Commission's rules, 47 C.F.R. §§ 0.191, 0.392.

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⁸ 47 C.F.R. §§ 1.1200 *et seq.*