

Before the
Federal Communications Commission
Washington, DC

In the matter of

Revision of the Commission's Rules to
Ensure Compatibility with Enhanced 911
Emergency Calling Systems

PS Docket No. 07-114

**REPLY COMMENTS OF THE
COMPUTER & COMMUNICATIONS INDUSTRY ASSOCIATION (CCIA)¹**

CCIA hereby files reply comments in the above referenced proceeding in support of the consensus roadmap for improving E911 location accuracy developed by public safety and mobile wireless industry leaders. The roadmap is technology neutral and inclusive as it leverages existing WiFi connections and Bluetooth beacons immediately to start delivering dispatchable addresses to first responders while remaining open to additional new technologies for producing greater indoor location accuracy.

The consensus roadmap is supported by the four nationwide mobile carriers along with the Association of Public Safety Communications Officials International (APCO), and the National Emergency Number Association (NENA), all as signatories. The plan is supported on the record also by CTIA, and the National Fraternal Order of Police.²

¹ CCIA is an international nonprofit membership organization representing companies in the computer, Internet, information technology, and telecommunications industries. Together, CCIA's members employ more than 600,000 people and generate annual revenues in excess of \$465 billion. CCIA promotes open markets, open systems, open networks, and full, fair, and open competition in the computer, telecommunications, and Internet industries. A list of CCIA's members is available online at <http://www.ccianet.org/members>.

² Comments of CTIA, Dec 15, 2014; Letter from National Fraternal Order of Police, Dec. 8, 2014. Numerous other public safety organizations support the roadmap as well. *See, e.g.*, Alabama Chapter of NENA, Dec. 15, 2014; Colorado Chapter of NENA, Dec. 12, 2014; Michigan Chapter of NENA, Dec. 17, 2014; New York Chapter of NENA, Dec.17, 2014; Pennsylvania Chapter of NENA, Dec. 11, 2014;

Other expert commenters such as the National Association of State 911 Administrators and the Texas 911 operators support FCC approval of the consensus roadmap as long as the Commission establishes additional accountability criteria and performance benchmarks.³

I. The Roadmap Offers Real Short Term Progress on Pinpointing Location of Emergency Callers and is Open to Other Technologies

The APCO/NENA/wireless industry roadmap is a great example of private sector collaboration in co-operation and partnership with the FCC. It is an achievable plan that includes real location accuracy advances the carriers are ready to start implementing right away, furthering the FCC’s goal of improving both outdoor and indoor wireless 911 location information for first responders. WiFi and Bluetooth technologies are fully integrated into the existing mobile wireless ecosystem and are not “untested” as some parties claim. The roadmap accelerates progress on location accuracy also by leveraging existing commercial location services.

By relying on a database approach, the roadmap facilitates continual improvements supporting indoor location accuracy in a technology neutral way. The roadmap takes advantage of LTE’s ability to use multiple simultaneous location solutions. It will not abandon ongoing efforts to improve latitude/longitude information. It specifically enables consideration of alternative solutions for vertical location within a building or even a sports stadium or other multi-story structure. Unlike some

Tennessee Chapter of NENA, Dec. 15, 2014; Indiana Chapter of NENA, Dec. 17, 2014; Virginia Chapter of NENA, Dec. 17, 2014; New York State 911 Coordinators Assoc., Dec. 8, 2014.

³ Letter from National Assoc. of State 911 Administrators, Dec. 12, 2014; Comments of Texas 911 Operators, Dec. 11, 2014; Comments of Int’l Assoc. of Police Chiefs, Dec. 15, 2014.

commenters claim,⁴ the test bed is open to any technologies and is not limited to those currently selected by the carriers.

Because the roadmap signatories concluded that the well-intentioned FCC plan was infeasible and would fail to produce dispatchable location information, they took the initiative to figure out what could work to achieve the same goals instead. But even ambitious timelines cannot ignore the need for standardization, network deployment and hand-set replacement.⁵ Pursuit of an unworkable construct with unachievable deadlines would only result in further delay before hitting predictable and inevitable roadblocks.

II. Extensive Stakeholder Outreach is Underway

While not every important stakeholder group could be part of the original technical working group that produced the roadmap just last month, the signatories have been conducting extensive outreach to all interested parties to explain the roadmap and address their diverse questions and concerns. This outreach effort includes meetings with consumer groups, regional and rural carriers, and state and local government officials.

III. FCC Enforcement is Part of the Plan

APCO, NENA and the carriers agree that their roadmap initiative should be supplemented concurrently by FCC rules codifying some of the provisions and ensuring timely implementation and compliance with benchmarks.⁶ While its performance metrics are different from those initially proposed by the FCC, the roadmap actually uses live 911

⁴ See, e.g., Comments of AARP at 1, Dec. 15, 2014; Comments of Hawaii Enhanced 911 Board at 3, Dec. 15, 2014; Comments of TruePosition at 4, Dec. 15, 2014; Comments of the Nebraska PSC at 3, Dec. 15, 2014.

⁵ Comments of the National Assoc. of State 911 Administrators at 6, Dec. 15, 2014; *contra* Comments of NARUC at 4-5, Dec. 15, 2014 (supporting more aggressive implementation deadlines than the FCC proposed but without acknowledging the preliminary work that must first be completed)

⁶ This is in contrast to claims by NextNav, Comments of NextNav LLC at 3-5, Dec. 15, 2014; Comments of TruePosition at 4, Dec. 15, 2014; Comments of BRETSA at 5-9, Dec. 15, 2014; Comments of Hawaii Enhanced 911 Board at 1, Dec. 15, 2014; Comments of AARP at 1, Dec. 15, 2014.

call data rather than test calls for evaluating performance and compliance. CCIA agrees this is a superior approach that will enable real accountability.

Transitional concerns about the need for modifications to handsets are unfounded because device modifications would be required for implementing any new program to improve 911 location accuracy as well as for the migration to 4G networks. The carriers have committed to selling only handsets that support the dispatchable address functionality.

IV. Conclusion

CCIA urges the Commission to support the breakthrough industry/public safety plan for providing first responders with critical indoor and outdoor dispatchable location information.

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Respectfully submitted,

Catherine R. Sloan
VP, Government Relations
Computer & Communications
Industry Association
900 17th Street, NW
Suite 1100
Washington, DC 20006
(202) 783-0070
csloan@ccianet.org