



# INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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Matt Gerst  
Director, Regulatory Affairs  
CTIA-Everything Wireless  
1400 16<sup>th</sup> Street, NW  
Washington, DC 20036

November 9, 2016

Dear Matt:

The International Association of Fire Chiefs (IAFC), International Association of Police Chiefs (IACP), and the National Association of State EMS Officials (NASEMSO) which are members of the CTIA Advisory Group, do not agree with or endorse the proposed structuring of the standards development. Also, the National Sheriffs Association (NSA), while not a member of the Advisory Group, endorse our position.

**Background:** In November 2014, the four-national wireless Commercial Mobile Radio Service (CMRS) providers and Association of Public Safety Communications Officials (APCO) and the National Emergency Number Association (NENA) entered a “Roadmap for Improving E911 Location Accuracy (Roadmap).” The Federal Communications Commission (FCC) adopted the fourth report and order on January 29, 2015, and released its report and order on February 3, 2015.

Leading up to the FCC order, numerous comments were submitted. On December 15, 2014, CTIA –The Wireless Association submitted comments discussing the Roadmap. In part II of the filing, CTIA states that the Roadmap establishes a near-term path to deliver dispatchable location (DL) information. The Roadmap cites DL as the “gold standard” for wireless location information. In the discussion, CTIA states that “like an address sent with traditional wireline 911 calls today, DL provides an address for wireless 911 call plus more specific information to send First Responders the right door to kick in.” We agree.

**Status:** At the quarterly meeting held September 30, the single biggest issue coming out of the meeting was the issue of standards development. As we understand the discussion, the CMRS providers are planning on having two levels of DL. DL Level 1 is information provided to the public safety answering point (PSAP) which will provide location information if the location is either one floor above or below where the individual is in a multi-level structure. DL Level 2 is the information provided which finds the individual on the same floor and the suite (in other words, “the right door to kick in.”) DL Level 2 follows the definition of DL in the Roadmap and the FCC order. Both APCO and NENA have agreed with the CMRS providers to provide DL Level 1 as well as DL Level 2.

As we understand the intention of the Roadmap signatories, DL Level 1 information is valuable to a PSAP and better than the x/y location within 50 meters (the alternative requirement where DL is unavailable). The IAFC, IACP and NASEMSO agree that the goal is to get the best information available to PSAPs. However, we fundamentally disagree that DL Level 1 meets the definition of “DL,” because it does not provide the location of the person in the building. We suggested calling DL “vicinity location” or a similar term to distinguish Level 1 information from DL. We cannot agree or support

Level 1 information as DL. Fire chiefs, police chiefs and EMS officials will not accept a DL Level 1 as being the gold standard.

**Recommendation:** We do not object to providing the best available information to PSAPs, but defining Level 1 information as “DL” is misleading and does not meet the FCC order or what the Roadmap states. We suggest that Level 1 information be called “vicinity location” or a similar term to describe what appears to be better information than the alternative to DL.

Jim Goldstein  
Manager, Government Relations  
IAFC

cc: Ken LaSala; Chief Gary McCarraher; Kevin McGinnis; Chief Eddie Reyes; Sheriff Paul Fitzgerald