



November 18, 2014

Rear Admiral David Simpson
Public Safety and Homeland Security Bureau Chief
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: PS Docket No. 07-114, Wireless E911 Location Accuracy Requirements

Dear Admiral Simpson:

Public Knowledge Submits Over 1,000 Petition Signatures Supporting the Commission's Proposed Indoor Requirements and Revisions to Existing E911 Rules.

With this letter, Public Knowledge submits over 1,000 petition signatures calling on the Commission to support strong indoor location accuracy requirements for E911 rules to ensure all 911 callers can be quickly and accurately located in emergency situations. Since the first location accuracy rules of 1996 were implemented, and then revised in 2010, wireless technology continues to rapidly evolve. Consumers have become increasingly dependent upon wireless technology as their main form of communication, shifting the way Americans call for help. It is estimated that of the 240 million calls placed yearly to 911, almost 70% originate from mobile devices, with over half of those placed from inside a building. With a majority of 911 calls now coming from wireless phones, the Commission's proposed rules would ensure that Public Safety Answering Points (PSAPs) can accurately identify the location of wireless 911 callers regardless of whether the caller is located indoors or outdoors.

Currently, wireless companies must deliver location information that is within 100-300 meters of the caller for 911 calls made outdoors.¹ As wireless usage patterns have changed and people increasingly use their wireless phones to call 911 from indoors, the Commission has justifiably recognized that these rules are sorely out-of-date and must be updated to ensure emergency services reach callers, no matter where or how they call 911.

Strong Location Accuracy Requirements Protect Vulnerable Populations that Depend on Wireless Technologies.

Many of the people who depend on wireless devices may not be aware that calling 911 from a mobile device indoors places them at a potential disadvantage during emergency

¹ See 47 C.F.R. § 20.18(h).

situations. One of the first phone numbers parents teach their children is 911, even before those children can remember their own address (or their babysitter's). But today, 47% of children live in wireless-only households.² The ability of dispatchers to accurately locate callers is also critically important for the 22% of senior citizens who live in wireless-only households. Callers in distress who are suffering from heart attacks or strokes may not be able to speak and depend on first responders to reach them quickly.

Age and health are not the only factors that affect a caller's ability to communicate with dispatchers. Victims of domestic violence may sometimes dial 911 but not be able to explain their need for help for safety reasons. Deaf and hard of hearing communities, as well as non-English speakers, also rely on location accuracy technology to ensure they are located in times of emergency.³

Public Knowledge embraces new technology, but believes they should still continue to support the basic values of our communications network. The Commission should continue to show leadership in this area and ensure that when 911 calls are placed, callers can reach help quickly.

The proposed rules are an important step for ensuring that the Commission maintains a network that is functional for all consumers regardless of race, sex, income level, disability or location. Strong 911 location accuracy standards are a critical component of the public safety value committed to by the Commission's unanimously supported "core statutory values" that must endure in our communications networks.⁴

In accordance with Section 1.1206(b) of the Commission's rules, this letter is being filed with your office. If you have any further questions, please contact me at (202) 861-0020.

Respectfully submitted,

/s/ Clarissa Ramon
Government Affairs Associate
PUBLIC KNOWLEDGE

² Steven Blumberg and Julian Luke, *Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, July-December 2013*, U.S. Dep't of Health and Human Services, Centers for Disease Control and Prevention (rel. July 2014), <http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201407.pdf>.

³ See Letter from Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. to Marlene Dortch, Secretary, FCC, PS Docket No. 07-114 (Nov. 3, 2014).

⁴ See Tom Wheeler, *Technology Transitions: Consumers Matter Most*, FCC BLOG (Oct. 31, 2014), <http://www.fcc.gov/blog/technology-transitions-consumers-matter-most>.