



February 14, 2023

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

COMMENTS

Re: *In the Matter of Location-Based Routing for Wireless 911 Calls* (PS Docket No. 18-64)

Dear Ms. Dortch:

The Industry Council for Emergency Response Technologies (“iCERt”) respectfully submits the following Comments in response to the FCC’s *Notice of Proposed Rulemaking (“NPRM”)* of December 22, 2022, in which it seeks comment on proposed rules to facilitate the implementation and use of location-based routing (“LBR”) technologies to route 911 calls. iCERt broadly supports the implementation and use of LBR technology and a more rapid implementation of NG911 capabilities that often occur concurrently. Implementation of such technologies will dramatically improve emergency response efforts, and we appreciate the efforts of the FCC to facilitate broader implementation of both.

iCERt is the nation’s only trade association focused exclusively on the emergency response sector. Our member companies represent a broad cross section of companies with a collective interest in advancing innovative solutions that will improve public safety communications and help protect first responders and the public they serve. This includes companies that develop, provide, and support 911/NG911 systems, services, and equipment, as well as carriers that provide their subscribers with access to 911 services.

iCERT supports the proposal to require wireless carriers and covered text providers to implement LBR technologies.

iCERT is a strong supporter of LBR technology. The improved location and routing methodology made available with LBR will reduce the potential for 911 voice calls and texts to be directed to Public Safety Answering Points (PSAPs) that are not the ones best able to provide timely and effective response. As a result, the use of LBR technologies should eliminate the delays associated with 911 call transfers, improve emergency response times, and save lives.

iCERT agrees with the NPRM that recent developments in the marketplace indicate that LBR is now technically feasible and that its wider use would yield significant public safety benefits by reducing the number of 911 calls requiring transfers.¹ Support for LBR implementation by the three nationwide wireless carriers, two of which have already widely implemented LBR and one which intends to do so soon, provides ample evidence that LBR will soon be ready for wider implementation.² Consequently, we agree with the FCC's proposal to require LBR implementation by both wireless carriers originating 911 voice calls and covered text providers originating texts to 911. We support the FCC's proposal to require nationwide carriers to implement LBR for 911 voice calls within six months of the effective date of an Order in this proceeding, while non-nationwide carriers would have an additional twelve months. We also support the FCC's proposal to require all covered text providers, without regard to service area, to implement LBR within eighteen months of the Order's effective date.

iCERT supports the proposal to require wireless carriers and covered text providers to use LBR technologies to route 911 calls and texts, if requested to do so by PSAPs.

iCERT agrees with the FCC that wireless carriers and covered text providers should not only implement LBR technologies but should use such technologies to deliver 911 calls and texts. Such providers, however, should not be required to do so unless PSAPs have indicated a desire to have such location and routing methodologies used for calls delivered to them. While it may not be necessary for a PSAP to have implemented NG911 capability to make use of LBR-based location information, we do find compelling those arguments that urge the FCC only to impose such a requirement where a PSAP has requested it and is ready to use it.³ Given that the use of LBR-based location information may impact a PSAP's operations, the FCC should not take lightly the imposition of such a requirement absent the PSAP's concurrence. We

¹ See NPRM at ¶ 14.

² See NPRM at ¶ 12.

³ See NPM at ¶ 21.

do not believe that conditioning the delivery of LBR-based calls on an affirmative request from PSAPs to accept such calls places a significant burden on them, and it ensures that any requirement imposed by the FCC is supportive of PSAP operations.

iCERT does not support the proposal to limit use of LBR to only those 911 calls or texts that meet a minimum location accuracy.

The NPRM proposes that wireless carriers and covered text providers be required to use LBR technology to route 911 voice calls and texts but only if they are able to satisfy a minimum standard for accuracy and timeliness.⁴ Importantly, LBR can only be used to route a 911 call if the caller's location is available to the wireless network provider at the time the call is routed. The FCC's Communications, Security, Reliability and Interoperability Council (CSRIC) has concluded that, for LBR to be effective in delivering 911 calls to the appropriate PSAP, a location fix must be determined within a five-second window.⁵ We agree that effective and timely emergency response requires both effective routing decisions and the timely availability of location information. Waiting to route the call until a particular location standard has been satisfied may cause delays with life-affecting implications. Consequently, we support the FCC's proposal to require use of LBR when the wireless network provider can determine the location of the caller within the recommended five-second window. If the caller's location is not available within this timeframe, the provider should use traditional cell site-based methods.

The NPRM also proposes to limit the use of LBR to 911 calls that meet a minimum location accuracy standard, i.e., one in which the available location information can identify the caller's horizontal location within a radius of 165 meters at a confidence level of at least 90%. iCERT does not support this proposal. We understand the importance of identifying a caller's location with the highest level of accuracy achievable. This is especially important in enabling a first responder to locate someone in need of assistance. In a dire medical emergency, the availability of timely and accurate location information can be the difference between life and death. However, the use of LBR to route a 911 call to a particular PSAP will, in most cases, be preferred over a cell site-based methodology. Even where the location of the caller is determined with a lower level of accuracy, the use of LBR to route the call will provide greater assurance that the appropriate PSAP will receive it, which will reduce call transfers and save lives. iCERT urges the FCC to require wireless service providers and covered text providers to route 911 calls and texts using LBR

⁴ See NPRM at ¶ 37.

⁵ See NPRM at ¶ 56.

when a location is available to the wireless network provider within a five-second window, but without regard to any location accuracy standard.

iCERT supports the proposal to require wireless carriers and covered text providers to deliver 911 calls, texts, and associated routing information in IP format upon request of 911 authorities who have established NG911 capabilities.

iCERT generally supports the FCC's proposal. Prompt and effective implementation of NG911 will substantially improve our nation's emergency response systems, and the delivery of 911 calls in IP format is an important part of our collective efforts to fully implement NG911. However, as the NPRM acknowledges, effective use of IP-based call delivery will depend on whether a PSAP has deployed NG911 capability and whether it is ready to accept calls in IP format. PSAPs across the country are in various stages of NG911 implementation, with many having done little beyond establishing an NG911 plan. We agree with the FCC that delivery of 911 calls in IP format to particular PSAPs should be tailored to the individual needs of those PSAPs. Consequently, we support the proposal to require delivery of calls in IP format only upon request of the PSAP (or other relevant 911 authority) and only where the PSAP has implemented NG911 capability in accordance with applicable standards. With regard to timing, we believe the adequacy of the FCC's six-month requirement is dependent on the details associated with how NG911 capability is determined and the process used by the FCC for facilitating PSAP requests. We look forward to the details of such proposals put forward in response to the FCC's NPRM.

Summary

In summary, iCERT broadly supports the implementation and use of LBR technology and a more rapid implementation of NG911 systems and capabilities. The rapid and effective implementation of such technologies will dramatically improve emergency response efforts, promote public safety, and save lives. We recommend adoption of the FCC's proposals, consistent with the additional advice provided here.

Respectfully submitted,

/s/ George Kelemen
Executive Director
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