

United States Senate

WASHINGTON, DC 20510

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November 15, 2018

The Honorable Ajit V. Pai
Chairman
455 12th Street, Southwest
Washington, DC, 20544

Dear Chairman Pai:

We write regarding the Federal Communication Commission's (FCC) existing rules governing location identification of 911 callers and the Commission's recent work to put in place new requirements that will bolster emergency personnel's ability to locate people in need. The FCC has proposed important new rules to ensure that Public Safety Answering Points (PSAPs) are able to receive callers' location information with enhanced precision, regardless of the type of device or service used to place 911 calls. As technology advances, it is imperative that the Commission continues to update guidelines governing the nation's emergency response system to meet Americans' health and safety needs. We commend the Commission for its work to implement critical updates to the 911 system, urge you to consider additional rules that would further improve the precision of location information sent to PSAPs, and request information regarding wireless carriers' compliance with existing standards.

All Americans should be able to dial 911 with the expectation that emergency personnel are capable of locating them quickly and accurately. Regardless of the technology or service that an individual uses to seek emergency assistance, PSAPs should receive the critically important location information that will allow them to effectively respond to the request. We are pleased, therefore, that in accordance with RAY BAUM'S Act, the Commission is proceeding to establish rules so that PSAPs can access addresses and other pieces of relevant location information when requests for emergency assistance are made through alternative technologies, such as multi-line telephone systems, interconnected Voice over Internet Protocol (VoIP) providers, text messages, and Internet-based Telecommunications Relay Services (TRS).¹ This proposal is an important step to bring the emergency response system into the 21st Century, as the manner in which Americans seek health and safety assistance continues to evolve.

The Commission should also consider implementing additional rules and updates to improve emergency response procedures, such as more precise location accuracy standards for wireless carriers. In 2002, the FCC implemented Phase II of the Commission's Enhanced 911 rules and required wireless carriers to provide PSAPs with the latitude and longitude within 50 to 300 meters of a 911 caller. In 2015, the FCC updated these rules and raised its accuracy standards.

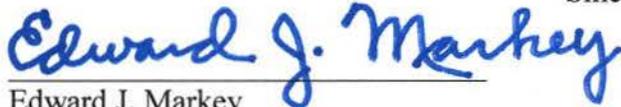
¹ *Implementing Kari's Law and Section 506 of RAY BAUM'S Act; Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, PS Docket No. 18-261, Notice of Proposed Rulemaking, FCC (September 26, 2018) (NPRM).

Specifically, it required wireless carriers to provide dispatchable location information within 50 meters of a caller for 80% of 911 calls by 2020. Delays in emergency response due to inaccurate or imprecise location information can cause tragedy.² Therefore, we request a status update and data illuminating whether wireless carriers are on track to meet this benchmark. Consistent with the Public Safety and Homeland Security Bureau's recent request for comment on new requirements for wireless carriers to provide 911 callers' precise vertical (z-axis) location information,³ we encourage you to explore the technical feasibility of requiring mobile carriers to provide even more precise caller location information to PSAPs, while ensuring the privacy of wireless callers and the security of their information.

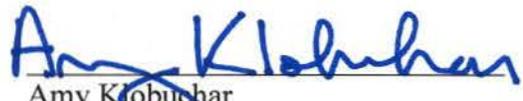
The accuracy of transmitted location information for a person in need can mean the difference between life and death. As the Commission continues to update 911 system rules, we urge you to consider all appropriate options for improving PSAPs' location identification capabilities.

Thank you for your attention to this important matter. We request a response to this letter by December 6, 2018.

Sincerely,



Edward J. Markey
United States Senator



Amy Klobuchar
United States Senator

CC: The Honorable Michael O'Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner

² Peter DeMarco, *Losing Laura*, Boston Globe Magazine (November 3, 2018), <https://www.bostonglobe.com/magazine/2018/11/05/losing-laura/WJrAFwMTYs1zwPfh5nTvGM/story.html>.

³ *Public Safety and Homeland Security Bureau Seeks Comment on Vertical (z-axis) Accuracy Metric Proposed by Nationwide Wireless Carriers*, PS Docket No. 07-114, Public Notice, FCC (September 10, 2018).