

**STATEMENT OF  
COMMISSIONER GEOFFREY STARKS**

Re: *Location-Based Routing for Wireless 911 Calls*, Notice of Proposed Rulemaking, PS Docket No. 18-64.

I am thrilled to see us move forward on location-based routing for wireless calls.

As I remarked when we made our proposal, 911 routing accuracy is an area where, for a time, new technologies actually risked bringing us *backward*. Here's what I mean. In the early days, our phone networks reliably connected us to the right 911 operator. But after a mobile revolution, the vast majority of 911 calls are now wireless. While our wireless networks, on the whole, have made it much easier to get help when and where we need it, many of them continue to use unreliable tower-based routing to figure out which PSAP should receive our emergency. That has led to millions of 911 calls each year going to the wrong jurisdiction.

In fact, the record shows that tower-based misroute percentages hover around a startling 11 or 12 percent—and that's just an average. Some jurisdictions report that 3 in 10, or more, of the 911 calls they receive should have gone elsewhere, and we've heard of even higher rates if you have the misfortune of calling from an area right along the lines of a PSAP boundary. I've visited a number of PSAPs across the country, and this ranks at the top of the concerns I've heard.

The good news is that new technologies have also given us much better ways of determining a caller's location than simply assuming they're located at the cell tower handling the call. So let's make sure we use them—as much as we possibly can, and across the country.

I'd like to thank the Chair and the Public Safety and Homeland Security Bureau for quickly moving this proceeding along from a record refresh, to a proposal, and today, to concrete new rules. It has my full support.