

**STATEMENT OF  
CHAIRMAN KEVIN J. MARTIN**

Re: In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems (CC Docket No. 94-102); Association of Public-Safety Communications Officials-International, Inc. Request for Declaratory Ruling, Wireless E911 Location Accuracy Requirements (PS Docket No. 07-114); 911 Requirements for IP-Enabled Service Providers (WC Docket No. 05-196)

E911 ensures that when someone dials 911 during an emergency, public safety can easily and reliably find them. To achieve that goal, we need to ensure that our enhanced 911 rules provide meaningful automatic location information that permits first responders to reliably find the public.

Multi-state or state-wide averaging can mask the reliability of 911 outside of large urban areas. For example, meeting location accuracy standards on average in the entire state of New York by providing enhanced 911 capability in Manhattan does not help first responders in Buffalo.

Quite simply, providing location accuracy information on a multi-state or state-wide basis is not enough. It does not provide public safety with the information it needs to do its job effectively. The tentative conclusion in today's NPRM to require location accuracy measurement at the PSAP-level will help provide necessary and possibly life-saving information to our first responders.

While I do not believe that it was the intent of our rules to allow state-wide averaging, we are seeking brief public comment on APCO's proposal to require location information on a PSAP-level basis. Our decision on this issue, however, must be prompt, as it will help set the stage for the discussions among all stakeholders on the means to achieve meaningful location accuracy in the quickest manner possible.

We have long known that the two location technologies used by carriers — handset-based GPS and network-based triangulation — each have limitations. Network-based technologies are not as effective in rural areas often due to lack of sufficient towers. Handset-based technologies are not as effective in urban areas, as signals often have difficulty penetrating buildings. In this respect, a network-based technology that works well in Manhattan may have little or no ability to locate an individual in other parts of the state. As technology has developed, however, so must our standards and expectations.

The Notice of Proposed Rulemaking recognizes that the different technologies chosen by carriers to date have limitations, and seeks comment on ways to remedy these shortcomings. For example, we specifically ask about the use of hybrid technologies that employ both handset-based and network-based location solutions. Among other things, the Notice also asks how roaming among carriers that use different location technologies should be addressed, and to what extent providers of interconnected voice over Internet protocol services should be required to provide automatic location information.

These are important questions, and the bar must be raised for E911. We expect that carriers, technology providers, and public safety entities will rise to the occasion, and I look forward to working with my fellow Commissioners on these critical public safety issues.