

**STATEMENT OF
COMMISSIONER ROBERT M. McDOWELL**

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)

I am hopeful that the *Notice of Proposed Rulemaking* we approve today will serve as a positive start to a challenging task. I am pleased that we are inviting comment and debate on a proposal from the Association of Public-Safety Communications Officials-International (APCO), which would require licensees subject to our E911 rules to satisfy location accuracy at a geographic level defined by the coverage area of each respective local Public Safety Answering Point (PSAP). Certainly it is of paramount importance that wireless E911 service satisfies the needs of public safety personnel, as well as the expectations of America's wireless consumers.

That said, we must walk before we can run. At the present time, it appears that measuring location accuracy at the PSAP level presents real challenges to carriers, technology providers, and PSAPs alike. Further, I understand that many wireless carriers are not generally capable of measuring and testing location accuracy at the PSAP level, and that they require adequate time to achieve this measurement. This is not surprising since there are over 6,000 PSAPs in the United States, each with unique deployment, topography, network, and RF propagation issues. Given these circumstances, I am delighted that the Commission will be building a more complete record upon which to make informed decisions as we move forward. And, I thank the Chairman for his support of this flexible, goal-oriented approach.

It is important to note that the *NPRM* we adopt today does not preemptively impose a geographic mandate. Rather, we first seek comment on whether to adopt the APCO proposal, and separately ask specific questions about the timing for enforcing any rule regarding geographic area or areas that we may adopt. While I appreciate the need to gather a record quickly on the merits of the APCO proposal (pursuant to the request of the association itself), I am also pleased that we are allowing a more reasonable comment period on the myriad implementation issues. I am counting on interested parties to raise and analyze all of the important issues surrounding E911 location accuracy, whether noted in today's *NPRM* or not. We must work together to establish realistic accuracy and reliability requirements that are achievable.

At the end of the day, I envision the development of a meaningful partnership among the commercial wireless industry, technology providers, and public safety entities that will ensure the best possible access to E911 location information for the benefit of wireless callers *and* emergency response providers in as expeditious a time frame as possible. I believe that harnessing the expertise of all interested stakeholders in this manner will serve the public interest and move all of us ahead to quickly solve these challenges in a straightforward, comprehensive and transparent manner.