

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Wireless E911 Location Accuracy) PS Docket No. 07-114
Requirements)
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)
_____)

**COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS
INDUSTRY SOLUTIONS' EMERGENCY SERVICES INTERCONNECTION
FORUM**

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of the Emergency Services Interconnection Forum (ESIF), submits these comments in response to the Federal Communications Commission's (Commission) *Public Notice (PN)* released September 25, 2008, in the above referenced docket.¹ ESIF continues to support the Commission's goal of ensuring that wireless carriers provide the most accurate and reliable location data available in order for public safety personnel to dispatch emergency services with greater accuracy when calls are placed into our nation's 9-1-1 call centers. ESIF is in agreement with those parties referenced in the docket that call on the Commission to convene industry groups to explore related wireless E911 location accuracy issues, and submits that it serves as the leading forum for industry participants to discuss and resolve many of the technical and operational interconnection issues related to the delivery of E911 services.

¹ In the Matter of Wireless E911 Location Accuracy Requirements, PS Docket No.07-114, *Public Notice*, DA 08-2129 (rel. September 25, 2008).

I. Background

ATIS is committed to providing leadership for, and the rapid development and promotion of, worldwide technical and operations standards for information, entertainment and communications technologies using a pragmatic, flexible and open approach. ATIS is accredited by the American National Standards Institute (ANSI). The ATIS membership spans all segments of the industry, including local exchange carriers, interexchange carriers, wireless equipment manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, providers of commercial mobile radio services, broadband providers, software developers, and internet service providers. Industry professionals from more than 300 communications companies actively participate in ATIS' open industry committees and other forums.

ATIS' ESIF serves as the primary forum for the telecommunications industry, public safety and other stakeholders to identify and resolve recognized technical and operational interconnection issues related to the delivery of E911 services. ESIF liaises with standards and government organizations to apprise them of its deliberations and decisions. ESIF also works closely with the National Emergency Number Association (NENA), which currently manages the technical evolution of the 9-1-1 system and emergency communications process. ESIF is an open, technical/operational forum that enables many different telecommunications entities to determine voluntarily the best practices and solutions to effectively and promptly deploy E911 services nationwide.

One of ESIF's primary work products is the "Wireless E911 Phase II Readiness Package," which was developed in collaboration with public safety organizations such as NENA and the Association of Public Safety Communication Officials-International, Inc. (APCO) and

representatives of wireless carriers and 9-1-1 service providers.² The package was developed to supply PSAPs with a standard method for verifying readiness and provide carriers with complete information to speed implementation of Phase II E911.

Additional work products by ESIF relevant to wireless E911 location accuracy include several technical reports, which are briefly described below:

- **High Level Requirements for Accuracy Testing Methodologies (ATIS-0500001).**³ This document addresses the need for industry-accepted requirements for testing accuracy performance of Wireless E911 Phase II systems.
- **High Level Requirements for End-to-End Functional Testing (ATIS-0500009).**⁴ This document provides testing parameters and considerations that can be utilized to evaluate E911 capabilities, addresses methodologies for testing the end-to-end functionality of a Phase I and Phase II E911 integrated network and provides a set of minimum requirements for individual test methodologies.
- **Maintenance Testing (ATIS-0500010).**⁵ This document provides a common framework for accuracy maintenance testing to ensure a wireless carrier's network maintains location accuracy compliance as changes and updates occur over time.
- **Location Technology Performance Data – Define Topologies & Data Collection (ATIS-0500011).**⁶ This document defines the topologies in which representative location accuracy data should be aggregated, and the methodology to accomplish such data analysis.
- **Location Acquisition for Internet Access Networks in Support of Emergency Services (ATIS-0500012).**⁷ This document describes the manner in which IP devices such as Voice over Internet Protocol (VoIP) clients obtain location information from an access network – location acquisition.

² *Wireless E911 Phase II Readiness Package*, ATIS Emergency Services Interconnection Forum (ESIF) (January 29, 2003). This document, as well as the other ATIS documents referenced in these comments, is available at www.atis.org/esif/doc.asp.

³ *High Level Requirements for Accuracy Testing Methodologies*, ESIF Technical Report ATIS-0500001 (2004).

⁴ *High Level Requirements for End-to-End Functional Testing*, ESIF Technical Report ATIS-0500009 (2006).

⁵ *Maintenance Testing*, ESIF Technical Report ATIS-0500010 (2007).

⁶ *Location Technology Performance Data – Define Topologies & Data Collection*, ESIF Technical Report ATIS-0500011 (2007).

⁷ *Location Acquisition for Internet Access Networks in Support of Emergency Services* ESIF Technical Report ATIS-0500012 (2007).

II. ATIS' ESIF Supports the Commission's Establishment or Designation of Technical Advisory Industry Groups to Address E911 Location Accuracy Requirements.

In the *Public Notice*, the Commission seeks comment on whether to convene industry groups to explore related wireless E911 location accuracy requirements. ESIF, as noted above, serves as one of the pre-eminent industry groups addressing wireless E911 related issues. ESIF agrees with the many commenters⁸ that have suggested that the Commission engage interested stakeholders, including industry groups, in an open consensus based forum to address many of the outstanding related wireless E911 issues (e.g., indoor/outdoor accuracy measurement testing and methodologies, next generation issues, location accuracy for interconnected VoIP services, E911 responsibilities in an open-access environment).

ESIF believes that industry groups play a vital role in assisting the Commission and other regulatory bodies in the development of appropriate technical based rules and regulations. Industry groups, such as ESIF, are able to draw upon the collective technical and subject matter expertise of various stakeholders in an open forum to devise solutions that benefit both industry and consumers.

ESIF has a vast body of technical work products used by industry participants in the implementation of E911 Phase I and Phase II. In light of the proposed changes to the existing location accuracy requirements noted in the *Public Notice*, ESIF is ready to review its existing accuracy methodology documents and technical reports to assess whether these documents need to be updated should the Commission adopt the proposed compliance area measurement requirement to specify the county level. ESIF believes that its technical reports and work products offer valuable insights and could serve as key inputs into any industry group convened

⁸ Joint letter of APCO and NENA filed July 14, 2008, Joint letter of APCO, NENA and Verizon Wireless filed August 20, 2008, Joint letter of APCO, NENA and AT&T filed August 25, 2008, in PS Docket No. 07-114.

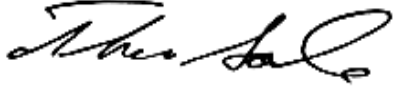
by the Commission to examine wireless E911 issues. Moreover, as the primary forum for the telecommunications industry, public safety and other stakeholders to resolve 911-related technical and operational issues, ESIF would be interested in playing a significant role in an industry group convened by the Commission.

III. Conclusion


ATIS' ESIF is committed to developing technically sound industry standards and practices that will assist wireless E911 providers to effectively deliver emergency services at any Commission-ordered compliance measurement. To that end, ESIF believes that its standards work in wireless E911 would offer valuable insights and provide a good basis for any Commission established forum of key industry stakeholders to further advance and resolve the wireless E911 location accuracy issues addressed in the *Public Notice*.

Respectfully submitted,

ATIS on behalf of ESIF

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