Resolution Urging the Federal Communications Commission to Improve Public Safety through Improved Location Accuracy Requirements for Wireless 911 Calls (Indoors and Outdoors)

WHEREAS, The American public depends on the National 911 emergency telephone number system for rapid assistance in emergencies and life-threatening situations and expects that 911 can promptly dispatch first responders to the correct location for the provision of aid and rescue services; and

WHEREAS, The Federal Communications Commission (FCC) estimates that seventy percent (70%) of all 911 calls made each year originate from a cell phone/wireless caller; and

WHEREAS, Accurately locating the point of origin for many of these roughly 168,000,000 wireless 911 calls represents a significant public safety issue for all National Association of Regulatory Utility Commissioners (NARUC) members; and

WHEREAS, In recognition of the reliance of the American public on the ability to call 911 from anywhere using cell phones, the FCC required wireless service providers to route calls and provide accurate location information associated with 911 callers to the designated Public Safety Answering Point (PSAP) to ensure that 911 professionals can rapidly locate and respond to emergency victims; and

WHEREAS, Recent 911 call data filed with the FCC from California, North Carolina, Oregon, Pennsylvania, Texas, Utah and Washington show that large percentages of wireless 911 calls over the past few years may have been delivered to their respective PSAPs without accurate location information, thereby endangering the public at large; and

WHEREAS, In addition to wireless carrier data filed with the FCC, other reports filed with the FCC from Texas and Washington describe how PSAPs that engage in re-bidding can obtain Phase II location information from wireless carriers at high levels, and recognize a technology balance between accurate and timely location information; and

WHEREAS, The FCC’s location accuracy requirements at present do not expressly require wireless service providers to locate wireless 911 callers who are calling from indoors even though a majority of all wireless 911 calls now originate from indoors; and

WHEREAS, The FCC has tasked the Communications Security, Reliability and Interoperability Council (CSRIC) IV Workgroup 1 - NG911 Sub Group 3 - Specification for Indoor Location Accuracy Test Bed with examining the requirements to establish a permanent entity to design, develop, and manage an ongoing public test bed for indoor location technologies that can provide the FCC with regular, comprehensive, unbiased and actionable data on the efficacy of location technologies; and

WHEREAS, The FCC opened a rulemaking proceeding on indoor wireless location accuracy in 2011, has gathered significant data in that proceeding, has received and reviewed various tests and reports showing that technologies are available today that can provide accurate location
information for indoor wireless 911 calls, and will consider a *Third Notice of Proposed Rulemaking* on improving wireless 911 location accuracy at the Commission’s next open meeting on February 20, 2014; *now, therefore be it*

**RESOLVED,** That the Board of Directors of the National Association of Regulatory Utility Commissioners (NARUC), convened at its 2014 Winter Committee Meetings in Washington, D.C., urges the FCC, due to concerns for public safety, to immediately clarify that the current rules regarding wireless 911 location accuracy apply both indoors and outdoors; *and be it further*

**RESOLVED,** That NARUC urges the FCC to develop and promptly adopt indoor and outdoor location accuracy requirements for 911 calls to:

1. Promote adoption of effective location technologies for indoors and outdoors 911 calls that will provide Phase II compliant location data within a reasonable time after the call is placed (or the number of seconds reasonably specified by 911 professionals);
2. Promote adoption of location technologies that can generate a location quickly enough and with sufficient accuracy to support x-y routing; and
3. Promote adoption of Next Generation 911 technologies and service, to be implemented based on available funding; *and be it further*

**RESOLVED,** That any new rules the FCC chooses to adopt for new indoor location accuracy requirements should be based on technically feasible, technology neutral, commercially available and standards-based non-proprietary technology; *and be it further*

**RESOLVED,** That NARUC urges the FCC to require indoor location accuracy requirements be implemented within one year and completed no later than three years from the effective date of these FCC requirements; *and be it further*

**RESOLVED,** That NARUC urges the FCC to adopt regulations that will require wireless service providers to promptly make available to PSAPs, and other public safety officials, comprehensive, timely and meaningful 911 location data, including location accuracy and performance criteria for each location technology regarding all wireless 911 calls.

*Sponsored by the Committee on Telecommunications*

*Adopted by the NARUC Board of Directors, February 12, 2014*