



**Cal OES**  
GOVERNOR'S OFFICE  
OF EMERGENCY SERVICES

**September 25, 2013**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Secretary Dortch:

**SUBJECT: PUBLIC SAFETY COMMUNICATIONS COMMENTS ON E9-1-1 PHASE II LOCATION ACURACY**

The State of California, Governor's Office of Emergency Services, Public Safety Communications offers the following select responses in regards to the FCC public notice DA 13-1873, Public Safety and Homeland Security Bureau Announces Workshop on E911 Phase II Location Accuracy, Released September 9, 2013 PS Docket No. 07-114.

Wireless usage has expanded significantly over the past few years. Americans are not only using wireless phones for a greater percentage of calls, they are increasingly using wireless phones for all calls, including calls to 911 from indoor environments. How have wireless providers and PSAPs been affected by the increase in the volume of wireless calls to 911, and how have they modified their practices to account for such changes? In addition, **we seek the submission of specific data that quantifies the increase in wireless calls to 911**, particularly the increase in wireless 911 calls from indoor environments.

- *Specifically, California received 18.7 million wireless 9-1-1 calls statewide in 2012, a 43.8% increase from 13.0 million wireless 9-1-1 calls in 2007. Additionally, the total 9-1-1 call volume in California increased from 23.3 million 9-1-1 calls in 2007 to 26.1 million 9-1-1 calls in 2012, an increase of 12.0%. As such, 55.8% of 9-1-1 calls were wireless in 2007, whereas 71.6% of 9-1-1 calls were wireless in 2012. As of June 30, 2013, wireless 9-1-1 calls comprised 72.7% of California's total 9-1-1 call volume.*

What factors affect whether individual 911 calls include or do not include delivery of Phase II location information to the PSAP? For example:

- **To what degree is the delivery of Phase II information to the PSAP with each call a function of automated versus manual processes?** *Should Phase II location information not be obtained upon call delivery and initial bid, Public Safety Answering Points may initiate additional requests for Phase II via an automated or manual rebid process. In June 2006, the Public Safety Communications issued a Memo to all California Public Safety Answering Points with regard to the use of automatic rebids for Automatic Location Information based upon information obtained by the wireless service providers, and recommended that call takers be allowed to make manual mid-call location updates as necessary. This recommendation was made due to caller audio blanking during the automatic rebid process and network congestion due to unnecessary bids overloading the network. This recommendation remains in place in California at this time.*

- **What measures do PSAPs and wireless providers undertake, in terms of ongoing monitoring of Phase II performance, both on an individual call basis and an aggregated basis? What types of metrics are monitored and how are they measured?** *The Public Safety Communications utilizes a statewide enterprise call tracking management information system to collect, analyze, and monitor various call performance measures, including the Phase I and Phase II performance of each wireless service provider throughout the California Public Safety Answering Points, as provided within the call detail record information collected within the system. All Public Safety Answering Points within California have agency specific access to this system as well, enabling each Public Safety Answering Point to monitor call volume and Phase I and Phase II performance on an individualized basis.*
- **In what percentage of wireless 911 calls is Phase II location information successfully delivered to the PSAP? How does current Phase II yield (percentage of wireless 911 calls that include Phase II location information) compare to Phase II yield in the past few years?** *In a comparison of Phase I and Phase II location information for wireless 9-1-1 calls from 2007 through June 2013, California has seen a 15.6% decrease in Phase II location information within the call detail records. At its peak in 2009, California received 60.4% of its wireless 9-1-1 calls with Phase II location information. For the period of January through June 2013, 5.2 million wireless 9-1-1 calls in California did not contain Phase II location information, with 56.3% of wireless 9-1-1 calls receiving only Phase I location information within the call detail record.*
- **What additional measures, including regulatory action, could help improve the delivery of Phase II E911 location information in the near term? In light of the expanding role of wireless technology in communicating with emergency services, are there regulatory gaps in the Commission's E911 rules? Are there public safety requirements for location accuracy that are not being met by the rules?** *With the impending implementation of Next Generation 9-1-1 and accompanying longitude and latitude routing of 9-1-1 calls, delay in receiving Phase II location information would severely handicap the ability to accomplish longitude and latitude routing successfully and in a timely manner. The FCC has an important role in the success of longitude and latitude routing in Next Generation 9-1-1 and must close existing gaps in the Commission's E9-1-1 rules pertaining to Phase II location information. Existing accuracy requirements must also incorporate a timing requirement in which Phase II information must be delivered to the mobile positioning center and available for retrieval by the Public Safety Answering Point. Phase II location information is being utilized in a live trial in California, in which Verizon Wireless 9-1-1 calls are routed to the appropriate Public Safety Answering Point based upon the Phase II location information of the caller. The trial has found that 56.0% of wireless 9-1-1 calls receive Phase II location information within the configured six seconds allowed from the initial location request. The Public Safety Communications requests the FCC consider a set timing requirement for the delivery of Phase II location information to support Public Safety Answering Point operations and assist in the transition to Next Generation 9-1-1 longitude and latitude routing based upon initial Phase II delivery.*

The Public Safety Communications strongly supports the FCC's attention to the recent concern regarding E9-1-1 Phase II location accuracy and timeliness of E9-1-1 Phase II location information availability.

Sincerely,



**Karen Wong**, Assistant Director  
Public Safety Communications

cc: William D. Anderson, Branch Manager, CA 9-1-1 Emergency Communications Branch