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### AT&T Calls Compliance With 2021 911 Mandate 'Challenging'

Citing the COVID-19 pandemic, AT&T, Inc., told the FCC today that it will be “challenging” to comply with the FCC’s April 3, 2021, deadline to deploy z-axis technology to within plus or minus of 3 meters for 80% of indoor 911 calls in the top 25 markets.

In an ex parte filing in PS docket 07-114, AT&T said that it “anticipates challenges associated with the testing required to demonstrate compliance for the upcoming April 2021 benchmarks as a result of the current COVID-19 pandemic. AT&T has imposed travel restrictions on employees to prevent the spread of infection and protect employees from exposure. In addition, access to multi-story buildings where the elevation of each floor has been professionally surveyed have been restricted by owners. We are attempting to obtain access to additional buildings and resurvey the elevation to allow for testing at these alternate locations, but the outcome is uncertain at this time, especially as major parts of the country are re-imposing travel and quarantine restrictions.

“For these reasons and others, compliance with the April 2021 benchmarks will be challenging,” AT&T added. “AT&T is committed to working in good faith to find solutions to these challenges but, at least in the near-term, the most obvious and effective solutions are for the Commission to adopt the alternate framework as suggested by CTIA and its nationwide wireless provider members or take meaningful action to encourage the OEMs to implement solutions to allow CMRS providers to meet the Commission’s deadlines.”

AT&T said that a draft 911 location accuracy sixth report and order that the FCC plans to consider at its July 16 meeting (see separate story) “represents an important step in improving location accuracy for 911 calls by providing vertical location to Public Safety. And while AT&T supports the goal of meeting of +/- 3m accuracy at the 80% benchmark reaffirmed by the Draft Order, this goal will be challenging to meet by the April 3, 2021 mandate. AT&T would have preferred the adoption of the alternate framework that allowed a phased in approach as suggested by CTIA and its nationwide wireless provider members but we remain committed to working with our partners to achieve a successful z-axis deployment to our wireless subscribers.”

“As suggested by Verizon, it is time for the Commission to take meaningful regulatory action to encourage handset manufacturers to implement z-axis solutions to enable CMRS providers to have any chance at meeting the Commission’s deadlines,” AT&T said. “We appreciate that the Draft Order attempts to address AT&T’s concerns about privacy by deeming a CMRS provider as compliant with the z-axis requirements when a consumer is required to ‘opt-in’ to a particular solution but declines to ‘opt-in’.”

A public safety veteran criticized AT&T's filing, telling TR Daily that it is "disappointing and troubling. I wonder if their filing today on time to implement means that they do not intend to meet their enhanced location services obligations to FirstNet as well. It is amazing that AT&T continues to fight the Commission and the general public in implementing z axis technology. This requirement has been around prior to the early 2015 Report and Order and it is now saying that over 6 years later there may not [be] enough time to be ready blaming obstacles such as covid. Public safety should be troubled by their filing. In my view, they are not acting as the trusted partner of FN that they should be."

In another filing today, the International Association of Fire Chiefs, International Association of Fire Fighters, International Association of Chiefs of Police, National Sheriffs' Association, and National Association of State EMS Officials told the FCC that they "strongly support the draft Sixth Report and Order (Draft Order), which proposes measures that will significantly improve emergency responders' ability to locate wireless 9-1-1 callers in the United States. Public safety has been a staunch advocate for the adoption of vertical location accuracy rules for many years. The Draft Order proposes a path forward that will ensure public safety will receive actionable location accuracy information when consumers place wireless 9-1-1 calls. Importantly, the Draft Order affirms the z-axis location accuracy benchmarks adopted in the Fifth Report and Order and requires the major wireless carriers to deploy z-axis technology nationwide by April 3, 2025. The Federal Communications Commission (FCC) should adopt the Draft Order and roundly reject all proposals to change or delay the implementation of the existing z-axis benchmarks."

The public safety organizations added that they "agree with the FCC that dispatchable location (DL) should be the preferred approach to determining a 9-1-1 caller's location. Dispatchable location solutions should be tested for their ability to meet the standard set in the statutory definition of dispatchable location — that is, the street address and additional information such as room number, floor number or similar information of the calling party. In order for public safety to be able to rely on and employ dispatchable location as a source of location accuracy information, testing must be straightforward and comply with the statutory definition of dispatchable location.

"We look forward to a future in which dispatchable location is technically feasible and can be deployed consistently across the United States. A standardized approach for DL confidence and uncertainty levels is essential to ensuring that public safety knows the degree to which it can rely on reported dispatchable location," the groups added. "For this reason, we had concerns about the ATIS standard for Location Accuracy Improvements for Emergency Calls (ATIS-0700028), which established two levels of dispatchable location. As dispatchable location is the gold standard for public safety, it is critical that standards for DL confidence and uncertainty levels do not confuse or weaken the definition of dispatchable location. Our organizations request the FCC's assistance in participating in a standards-development process for dispatchable location confidence and uncertainty that will ensure that the standards reflect concrete and comprehensible metrics."

The filing continued, "In order to ensure that public safety and the public is aware of the state of dispatchable location technology (as NEAD [National Emergency Address Database] testing provided) and that public safety can be an informed participant in the DL standards-development process, the FCC should ensure that all dispatchable location solutions are not only tested, but also that the test results are issued publicly before the solutions can be used to comply with FCC rules."

The groups also noted that "[i]n prior filings, we have argued that the FCC should narrow the z-axis metric. Although the Draft Order declined to adopt our recommendation, the FCC should nonetheless

evaluate the status of location accuracy technology on [a] biannual basis and consider narrowing the metric should it become clear that achieving a narrower metric is technically feasible.”

Meanwhile, the Safer Buildings Coalition today endorsed proposals included in a National Public Safety Telecommunications Council filing yesterday concerning the FCC’s draft order (TR Daily, July 8).

“The Safer Buildings Coalition agrees with NPSTC’s support of the Commission’s decision to expand its wireless location accuracy requirements to require that z-axis data be provided nationwide by April 2025,” the coalition said in a filing in PS docket 07-114. “Mandating nationwide coverage should not be burdensome for wireless carriers given the fact that multiple location technology vendors, including Apple, Google NextNav, and Polaris have indicated that their services either already are or soon can be made available on a nationwide basis. The near-term availability of +/- 3-meter accurate vertical location services will greatly assist first responders who are the feet on the street responding to a call for help. Timing is key in a life-or-death situation in answering and responding to a 9-1-1 call. Expedient arrival of first responders requires that they have accurate information on the location where assistance is needed. For multi-story buildings, that not only requires the location of the building, but also the floor level where the caller is located.

“Given the importance of highly accurate vertical location information, NPSTC also urges the Commission to revise its draft order to take further steps to ensure that there are continual improvements in vertical location accuracy,” the coalition added. “For example, NPSTC strongly supported tightening the vertical metric to 2 meters, or even 1 meter if possible, in the relatively near future. As NPSTC has previously observed, at least one location technology vendor has already demonstrated accuracy of better than 2 meters, indicating that the time frame required for tightening the requirement may not be lengthy. Thus, to facilitate the rapid implementation of more accurate capabilities, the Commission should consider establishing additional milestone dates by which 2-meter accuracy will be required, potentially following the current 3-meter milestones by two or three years.”  
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