

Sept. 16, 2020

Postponement of 911 Location-Accuracy Testing Concerns Safety Groups

The National Sheriffs' Association and the International Association of Fire Fighters say they are concerned that the wireless industry has postponed the next stage of 911 location-accuracy testing and they said they oppose any efforts to delay an April 2021 technology deployment milestone.

CTIA told the FCC last month that the next stage of 911 location-accuracy testing has been postponed due to the COVID-19 pandemic (TR Daily, Aug. 25). Carriers have said they won't likely be able to comply with the 2021 milestone.

In an ex parte filing in PS docket 07-114, CTIA, on behalf of the 9-1-1 Location Technologies Test Bed LLC, which it established, said "the next round of testing of 9-1-1 vertical (Z-axis) location technologies, Stage Zb, will be delayed due to the impact of COVID-19. As described below, the response to the COVID-19 pandemic is restricting building access and affecting the ability to safely and effectively test Z-axis technologies. The Test Bed intends to resume Stage Zb when testing can be safely accomplished and property managers agree to provide access to buildings in the test cities."

In an ex parte filing yesterday, NSA said, "Given the immediate benefits to public safety that will result from the provision of accurate vertical location information, wireless carriers must continue to be required to implement such technologies as rapidly as possible. The Commission adopted the first deadline for the provision of vertical location information more than five years ago. Rather than promptly take steps to comply with this deadline, the carriers waited three years, until 2018, to hold their first vertical location 'Stage Z' test bed. During the two years thereafter, the carriers completed only one additional test bed, 'Stage Za.' Given the [carriers'] complete absence of diligence in complying with the Commission's requirements, it was predictable that the carriers would seek to postpone indefinitely a third round of testing because of the COVID-19 virus.

"NSA obviously recognizes the tremendous social costs that the pandemic is imposing on our society. The carriers, however, were given more than ample time to complete the vertical location test process," NSA added. "Further, as the Commission has acknowledged, the Stage Z testing that was completed in 2018 demonstrated that two location technologies can meet the three meter vertical location requirement. One of those vendors is reportedly working with AT&T to deploy its vertical location technology in 105 cities. Therefore, the carriers already have a clear path to compliance regardless of whether any additional testing is completed.

"Based on this background, the NSA strongly opposes any consideration of a delay, no matter how brief, in the April 2021 implementation deadline for the provision of vertical location information in the 25 largest communities," it said. "The Commission provided the carriers six years to achieve compliance

with the initial vertical location accuracy requirement, the first three of which were squandered by the carriers through their own inaction. Given the tremendous lifesaving benefits that accurate vertical location information will provide to public safety, any additional delay would be unwarranted and would be exceedingly harmful to our members and the communities that they serve.”

In a filing last Friday, the IAFF said it has “caused some distress to learn that CTIA recently announced the suspension of the Stage Zb test bed. Although the suspension is understandable, we remain concerned that it will encourage the carriers to once again seek an extension of the April 2021 deadline to begin providing vertical location data to support public safety in this country’s largest cities.”

The group said that “even if the Stage Zb test bed had been conducted as planned, it seems unlikely that it would have certified the compliance of an additional vertical location vendor. Google very recently participated in the Stage Za test bed and CTIA acknowledged that Google’s technology exceeded the 80th percentile metric in only one morphology. Although we have every expectation that Google is continuing to improve its technology, the progress of such improvement may be measured.

“The extension of the April 2021 deadline will undoubtedly result in the injury and loss of community residents and first responders,” the group added. “Any additional consideration of a delay of the April 2021 deadline would also entail a wholly inappropriate use of public resources. As we noted in the opening of this letter, the nearly continuous process of revisiting these issues before the Commission requires an excessive involvement of administrative resources that the public safety community cannot spare during the pandemic. This organization simply does not have the resources to participate in still another notice and comment process (or in a negotiation with the carriers) regarding whether the deadline that was first established in 2015 should be extended mere months before its implementation. Therefore, the Commission should firmly disregard any suggestion that the suspension of the Stage Zb test bed could justify an extension of the April 2021 deadline.” - Paul Kirby, paul.kirby@wolterskluwer.com

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