

Update on the FCC's Wireless E9-1-1 Location Accuracy Rules

By Jackie Mines

Back in May 2008, the FCC approved a Notice of Proposed Rulemaking (FCC 07-166) that would change the location standards for mobile wireless and nomadic Voice over Internet Protocol (VoIP) telephone services. Existing rules allow carriers to meet location and liability standards by averaging across multiple service areas (regional or multi-state averaging) masking reliability issues in rural areas. The proposed rules would require standards to be met at the PSAP level.

A consortium of wireless carriers are challenging FCC 07-166. In August 08, NENA, APCO, AT&T, and Verizon Wireless collectively sent two letters to the FCC Chairman. The purpose of these letters was to suggest a compromise to FCC Document 07-166. Most significantly Verizon and AT&T have agreed that location accuracy should be measured at the county level. NENA and APCO agree with these proposals because in many cases county boundaries are identical to PSAP boundaries and not prone to administrative boundary changes. The FCC has yet to respond to these letters. We will keep you updated on the status.

The following in PDF format are copies of the comment letters to the FCC proposed rules:

[APCO and NENA comment to rules dated 7-14-08](#)

[AT&T Verizon, APCO and NENA comment to rules dated 8-25-2008](#)

[AT&T Verizon comment to rules dated 9-5-2008](#)

[APCO and NENA comment to rules dated 9-9-2008](#)

[APCO and NENA comment to rules dated 10-14-2008](#)