



February 14, 2018

Hon. Félix G. Lassalle Toro
Presidente
Comisión de Seguridad Pública
Cámara de Representantes de Puerto Rico
El Capitollo, Apartado 9022228
San Juan, Puerto Rico 00902

Via email: flassalle@camaraderepresentantes.org

Dear Presidente Lasalle Toro:

On behalf of CTIA®, the trade association for the wireless communications industry, I write to oppose Puerto Rico P.C. 854, the "Public Safety 911 Emergency Calls Rapid Response Act," which would order cellular service providers in Puerto Rico to disclose information on the location of a device in emergency cases where a user needs and requests assistance of public safety agencies via the 911 system. This bill is not necessary because providers already offer this information to local Public Safety Answering Points (PSAPs).

This legislation is unnecessary because Puerto Rico's public safety officials already direct wireless providers to route 911 calls to a designated PSAP. The Federal Communications Commission (FCC) rules require wireless providers to transmit all wireless 911 calls to a designated PSAP.¹ Under those rules, a PSAP is defined as a "facility that has been designated to receive 911 calls and route them to emergency services personnel."²

Across the U.S., over 300 million mobile devices—with different capabilities, from first generation smartphones to the most up-to-date smartphone—are used to call 911, while over 6,000 different 911 centers or PSAPs—with varying technical capabilities and legal authorities—respond to these 911 calls. When a PSAP receives a wireless 911 call and requests location information, wireless providers work hard to ensure that all parts of devices, networks, and servers work together to deliver actionable information to the PSAP, usually within 30 seconds.

With our public safety partners, CTIA and our member companies are committed to constantly improving our nation's 911 system. However, unlike 911 calls from

¹ 47 C.F.R. 20.18(b)

² 47 C.F.R. 64.3000(b)



landline phones—which provide the caller's phone number and associated street address to Public Safety Answering Points (PSAPs)—there's a unique variable with 911 calls placed from wireless devices: the person calling could be located anywhere, from a major highway to the 6th floor of a high-rise. That information—an estimate of a 911 caller's location, available to PSAPs from the wireless service provider when a 911 call is initiated—is known as wireless 911 location accuracy.

While wireless 911 location technologies have helped first responders save lives for more than 20 years, consumers have integrated new commercial location-based services (LBS) into their daily lives. These commercial LBS services have created incredible opportunities such as for ride-sharing and goods and services delivery. However, wireless 911 location is different as there are more diverse calling environments and more stakeholders involved. Additionally, the stakes are much higher in that location information needs to get first responders to an emergency quickly, effectively and safely.

CTIA is working with other stakeholders to develop a National Emergency Address Database (NEAD) that will support wireless providers' ability to provide PSAPs with dispatchable location information: a street address of the wireless caller and—when necessary to adequately identify the caller's location indoors—more information like an apartment, office, or suite number.

For more than 20 years, wireless consumers have used cellphones to call 911 for help during an emergency. During that time, wireless providers developed the capabilities to deliver location information that helps public safety respond to emergencies, wherever and whenever wireless 911 calls are made and continue to upgrade their systems to provide the effective location information to public safety that works best with complex systems in varying environments and therefore this legislation is not necessary.

Sincerely,

Lisa V McCabe

Director, State Legislative Affairs

Cc: Iraida Torres Flores, itorres@camaraderepresentantes.org