

December 15, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission

**In the Matter of E911 Location Accuracy Proceeding on Location Accuracy Roadmap,
PS Docket No. 07-114**

Dear Ms. Dortch,

The American Association of People with Disabilities, American Foundation for the Blind, National Council on Independent Living, United Spinal Association, and World Institute on Disability submit the following comments regarding the matter above.

The issue of indoor location accuracy affects our members greatly, as many are unable to effectively communicate with 911 dispatch. We are encouraged by some key components of the Roadmap for Improving E911 Location Accuracy entered into among the four nationwide wireless carriers, APCO, and NENA. The Roadmap represents a promising milestone reached by wireless industry and public safety organizations to come together in agreement on an issue of critical importance for people with disabilities. The parties' initiative in developing a plan that increases the ability to use a dispatchable location could have significant benefits for consumers with disabilities by enabling First Responders to locate 911 callers more accurately and quickly.

Although harnessing commercial Wi-Fi databases and Bluetooth beacons for these purposes as proposed by the Roadmap is new, we look forward to the unique potential that its application might have beyond E911 calls. We do, however, urge the carriers and public safety organizations to monitor any new and innovative technologies that emerge during the implementation of this plan which could more accurately and expeditiously aid in the identification of wireless users and adjust the plan accordingly.

We value the Commission's oversight in the sector of E911 call performance and hope that the rules that the Commission feels will best protect the needs of wireless callers indoors also move towards the promotion of ongoing and steady improvement in this ever-advancing technology.

As 911 and public safety benefits and their implications for the populations we represent are given heightened priority by carriers, we look forward to working with the parties going forward. Continued involvement of representatives from the disability community is the most expeditious way to ensure that the plan is implemented in a manner that is inclusive of the varied interests of this diverse community.

Sincerely,

American Association of People with Disabilities
American Foundation for the Blind
National Council on Independent Living
United Spinal Association
World Institute on Disability