

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

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July 5, 2007

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Comments of the New York State Department of Public Service in PS Docket No. 07-114, CC Docket No. 94-102, and WC Docket No. 05-196; Wireless E911 Location Accuracy Requirements.

Dear Secretary Dortch:

The New York State Department of Public Service (NYDPS) respectfully submits these comments to the Federal Communications Commission (FCC) on its Notice of Proposed Rule Making (NPRM) in the above-captioned proceedings. The NYDPS agrees with the FCC's tentative conclusion supporting the Association of Public-Safety Communications Officials-International, Inc. (APCO) proposal to specify the standards for wireless Enhanced 911 Phase II location accuracy and reliability and to require wireless carriers subject to this rule to satisfy these standards at a geographic level defined by the coverage area of each respective local Public Safety Answering Point (PSAP).

New York State has a vital interest in ensuring that all of its residents, regardless of the type of telecommunications equipment and services they use, have the capability to dial 911 to contact appropriate emergency services responders. An absolutely essential component of Enhanced 911 (E911) service is the provision of sufficiently accurate caller location information to the PSAP to ensure a rapid, situation-appropriate response. Over the years, as technology has evolved, callers to 911 have come to expect that their exact location is being automatically provided to the PSAP. This expectation exists whether the caller uses wireline or wireless service to call 911. When accurate location information is not transmitted with the wireless call, emergency responses may be delayed.

The NYSDPS agrees that wireless carriers should be subject to automatic location information compliance requirements based on the geographic coverage area of local PSAPs as

NYDPS Comments

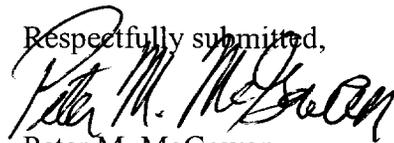
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July 2, 2007

this is the only way that the public can be assured of adequate coverage. State- or region-wide averaging can mislead the public about the reliability of their wireless E911 service.

In sum, the NYDPS supports the APCO proposal to specify the standards for wireless E911 Phase II location accuracy and reliability and to require wireless carriers subject to this rule to satisfy these standards at a geographic level defined by the coverage area of each respective local Public Safety Answering Point (PSAP).

Respectfully submitted,



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