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Before the Federal Communications Commission

In the Matter of:
Wireless E911 Location Accuracy Requirements
Docket No. 07-114

REPLY COMMENTS OF THE NATIONAL STATES GEOGRAPHIC INFORMATION COUNCIL (NSGIC)

July 1, 2025

Introduction and Summary

The National States Geographic Information Council (NSGIC) appreciates the opportunity to submit these reply comments in response to the Commission's Further Notice of Proposed Rulemaking regarding wireless E911 location accuracy requirements. NSGIC represents the state-led geospatial community, working to advance national coordination of geospatial policy and data infrastructure in support of public safety, economic development, environmental management, and more.

NSGIC joins commentators including GeoComm, NENA, and major carriers in affirming the critical importance of reliable vertical location information, specifically Height Above Ground Level (AGL) and floor-level data, in emergency response. We write to address the key question:

Who is best positioned to deliver actionable vertical information to Public Safety Answering Points (PSAPs)?

From our perspective as stewards of state geospatial infrastructure, the answer is clear: Commercial Mobile Radio Service (CMRS) providers should be responsible for performing HAE-to-AGL conversions and delivering complete vertical location data. The technical barriers cited by some commenters are outdated, and the costs of implementation are better borne by national providers than by over 5,700, locally funded PSAPs. The United States has already invested in a national digital elevation backbone through the U.S. Geological Survey's 3D Elevation Program (3DEP), and that infrastructure is ready to support this application.

This is not a debate about whether vertical accuracy is important, it is. It is a debate about implementation, equity, and effectiveness.

I. National Data Infrastructure and GIS Capabilities Are Sufficient to Support Carrier-Led AGL Delivery

The geospatial community has made tremendous progress over the last decade in building out the elevation component of the National Spatial Data Infrastructure (NSDI). The USGS 3DEP program now provides nationwide high-resolution elevation data (typically 1-meter resolution or better), freely available via The National Map. This data is already being used by commercial platforms to support AGL and floor-level estimates in operational settings.

Arguments that terrain models are insufficient or that datum transformations introduce unacceptable uncertainty no longer reflect the state of the art. These are routine functions in modern geospatial workflows. Further, conversion tools are already embedded in commercial platforms used across the public safety community.

Where local enhancements exist, such as surveyed building interiors or floor-level datasets, these can and should be layered on top of a consistent national terrain baseline, not used in isolation. Requiring every local PSAP to source, manage, and apply elevation data independently would fragment the system and impose inequitable burdens.

By placing responsibility for AGL with Carriers in this rulemaking, the FCC has the opportunity to help fully realize the value of the NSDI's elevation component, maximizing the return on investment of this national asset.

II. Carriers Are the Logical and Equitable Point of Responsibility

CMRS providers already deliver HAE data. Extending their responsibility to include AGL and, where possible, floor-level estimates are an incremental but essential step. It ensures that all PSAPs, regardless of jurisdictional size, staffing, or budget, receive consistent vertical location data.

Leaving this responsibility to PSAPs would create widespread duplication, increase taxpayer burden, and introduce uneven reliability based on local capacity. Carriers, by contrast, operate at scale, can integrate conversion workflows efficiently, and are better positioned to maintain quality and consistency across networks.

Importantly, requiring AGL delivery by CMRS providers will not disadvantage small or MVNO carriers. Most already rely on host networks that could extend this functionality through updated agreements and APIs.

By affirming carrier responsibility for delivering complete vertical location data, the FCC can ensure all communities, regardless of geography or funding, receive the raw materials to benefit equally from public safety innovation.

III. A Carrier-Led Model Supports National Consistency with Room for Local Enhancement

NSGIC strongly supports a model that ensures national consistency in how vertical data is calculated and transmitted. Such a model should:

- Build on existing E911 location workflows at the carrier level;
- Leverage publicly available 3DEP elevation data for AGL conversion;
- Deliver standardized metadata to ensure downstream interpretability;
- Allow PSAPs to add locally curated data enhancements without duplicating baseline conversions.

This approach maximizes the public return on federal data investments while maintaining the flexibility needed for local innovation.

By embedding national consistency at the network level and preserving room for local enhancement, the FCC can foster a scalable model that works for both rural and urban America.

IV. Cost Burden Should Fall on the Competitive Marketplace, Not Local Taxpayers

Requiring over 5,700 individual PSAPs to build and maintain separate AGL conversion capabilities would be inefficient and inequitable. The burden would fall disproportionately on under-resourced jurisdictions, exacerbating existing disparities in emergency response capabilities.

By contrast, assigning this responsibility to carriers allows for centralized implementation, economies of scale, and clear lines of accountability. In practice, the marginal cost of adding AGL conversion to existing location workflows is small, especially when amortized across national networks.

By assigning this responsibility to carriers, the FCC can align cost with capacity, leveraging the competitive marketplace rather than straining local government budgets and resource capacity.

Conclusion

The geospatial and public safety communities agree: AGL and floor-level location data saves lives. The national elevation infrastructure exists. The technical workflow is proven. And the

implementation pathway is clear.

NSGIC urges the Commission to adopt rules requiring CMRS providers to deliver complete vertical location data, including AGL and floor-level estimates, alongside HAE, with every 911 call. Doing so will fully leverage national investments in developing a state of the art NSDI, promote national consistency, accelerate deployment, reduce duplication, and ensure that all communities, regardless of size or funding, can benefit from modern emergency location technologies.

Respectfully submitted,

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