Chief Fire Officers Association

Additional comments:

Question 1.1: Is Ofcom correct in focusing its attention on ECLI for mobile emergency calls (as opposed, for example, to fixed-line or VoIP calls) at this time?:

The benefits for the Fire and Rescue sector for improved location information for mobile phones are numerous and the sector concur with the data and findings contained in the Ofcom report, regarding the additional time taken, on occasions to handle calls made from mobile phones.
Improvements in accuracy of mobile call ECLI, for the Fire and Rescue sector;

-Have the potentially to enable quicker response times to emergencies the location is unclear or unknown by the caller,
-Providing location information to 'challenge' those calls that are thought of as malicious and currently divert much needed resources away from an actual incident.
-Ability to confirm accurate location information may save additional resources from being mobilised
-Assist callers who are unable to communicate verbally
-Can lead to quicker call handling times reducing the time it takes to get help
-Provide the capability to accurately locate a tweet or status update from a mobile, allowing emergency services to respond to calls for assistance using this method

The increasing use of consumer communication devices that do not support voice e.g. tablet PCs means it is likely to be difficult for the EAs to converse with the users of these devices to ascertain their location in the same way that can be achieved using voice calls. EA's need to be prepared to accept emergency calls from social media location details can be hampered by the fact that tweets are limited to 140 characters.

The Fire and Rescue service also recognise the importance of providing accurate location information for VoIP callers at the earliest opportunity. A report by Point Topic Ltd (http://point-topic.com/wp-content/uploads/2013/02/Sample-Report-Global-VoIP-Statistics-Q2-2012.pdf), suggests that there are around 3.85 million VoIP subscribers in the UK, an increase of 80,000 on the year before.

Question 1.2: Are there, in your view, any concerns associated with the current provision of mobile ECLI in terms of a) accuracy and b) reliability? If so, what are these concerns?:

Location ellipses are wide with typical Precision based on cell sites being anything between 2 to 20Km.

A precision is 4Km can result in a search are of 50Km2 which can mean, when the caller is unsure of the location of the incident, modern mobile phone technology (google maps etc) does not assist the EA's and could lead to the deployment of a number of additional resources to search for the incident. This impact typically, may be felt more in FRS that have rural

locations, served by fewer cell sites covering larger area. Improvements in positional accuracy would therefore greatly assist fire and rescue services when trying to reach and treat casualties within the 'golden hour' and mitigate losses in a cost effective way.

Question 2: Do you agree that network-based approaches could offer solution to tackle the potential issues regarding reliability and accuracy of mobile ECLI?:

The Fire and Rescue service would benefit from more accurate location information from mobiles regardless of this is a networked based approach or via a handset based approach.

Question3: To what extent would the provision of such solutions be reliant on the deployment of LTE networks and what would be the likely timescales for implementing such solutions?:

The Fire and Rescue service recognise the benefits using LTE networks can bring and are actively involved in utilising the longevity of an LTE solution through the Emergency services mobile communication project (ESMCP)

Question 4: Could these solutions offer the same benefits to Limited Service State (?LSS?) callers and internationally registered callers as for domestic end-users using their ?home? network?:

This information could be useful for the Fire and Rescue sector, as the callers location may often not be known, or may be interpreted wrongly by international travellers reporting an incident.

There are approx. 330 different languages spoken by Londoners and visitors to the capital, and this can lead to difficulties in accurately identifying the location of an incident, delaying the arrival of help from the Fire and Rescue service.

If additional advice and assistance was required by the caller and language was a barrier to providing more additional information from LSS, such as the location of internationally registered caller's address including the country or origin may assist control rooms to better access the right translation services required to assist the caller.

Question 5.1: Do you think that handset based approaches (e.g. Apps) could offer a cost-effective and dependable means to tackle potential problems linked to accuracy and/or reliability in mobile location information? If so, what are the likely costs to all parties involved in the end to end support of handset-based approaches?:

The Fire and Rescue service would benefit from more accurate location information from mobiles regardless of this is a networked based approach or via a handset based approach.

Question 5.2: Do you see solutions such as Apps as a long-term alternative to network-based approaches?:

The Fire and Rescue service would benefit from more accurate location information from mobiles regardless of this is a networked based approach or via a handset based approach.

Question 6: What are the changes that EAs would suggest in order to address potential issues regarding accuracy and reliability of mobile ECLI?:

-Ability to pinpoint the precise location of the mobile phone in use in order to send a response for help as quickly as possible.
-Ability to provide any available registered user details
-Ability to locate callers within buildings would be of great assistance during calls where the Fire service are providing survival guidance to callers i.e. building fire, building collapse; by providing accurate location details (location in the dwelling, level of floor location) rescue efforts could be coordinated easier and quicker
-Ability to identify the location of any malicious caller and to pass this information to the relevant authorities quickly halting this abuse, and would be an improvement on current methods.

Question 7: What would be the potential costs implications for EAs if such changes were to be implemented?:

With the recent investment from DCLG and the Fire and rescue Services in improved, resilient mobilising systems, all which have the ability to receive current EISEC information, it is perceived that integration into any Fire Service's control and communication system would have a cost implications, although this is not anticipated to be a large cost. There may be additional costs to automatically populate this information onto a CAD system and GIS but again this is not envisaged to be costly.

Question 8: Are there ways in which tackling potential issues regarding the accuracy and/or reliability of mobile call ECLI could adversely affect consumers, and could these be mitigated?:

Fire and Rescue services would support the introduction of improved mobile call ECLI. On occasions, a considerable amount of time and resources are spent indentifying and locating callers that are 'abusing' the 999 service. Recently a metropolitan FRS reported an occasion where a number of calls (50+) were made to all three emergency services over an 8 hour period in London, by a caller using a number of different mobile phones from one location. The EA's experienced a number of difficulties and time delays by not being able to gain accurate mobile call ECLI. It took approx. 4 hours and used a considerable number of resources to resolve this issue.

Question 9: If Ofcom was to consider setting further criteria for the accuracy and reliability of ECLI, should these be independent of the technology used by a CP?:

The Fire and Rescue Service encourage further development in mobile ECLI that is sustainable and has longevity in order for the EA's to continue to respond to the wide variety of incidents reported from mobile phones and be ready to respond to the different ways to receive calls for assistance i.e. E- Call vehicle initiative and social media

FRS would support the adoption of open standards, enabling the 5 current FRS CAD suppliers, and a number of ICCS suppliers, able to adopt these standards and mitigate costs to implement ant changes to take advantage of improved mobile call ECLI.