Federal Communications Commission (FCC) Notice of Proposed Rulemaking
PS Docket No. 18-64
Location-Based Routing for Wireless 911 Calls
Comment from the American Trauma Society

Over the past 55 years, the American Trauma Society (ATS) has dedicated itself to the elimination of needless death and disability from injury, working at all levels of government to obtain legislative support for trauma systems. Our goals to mitigate injury whenever possible include teaching the public about injury prevention and bystander care, accurate communications to public safety answering points (PSAP) to request assistance, timely response by trained professionals, and optimal treatment along a trauma care continuum when injury does occur.

Physical trauma is caused when blunt, blast, crush, and penetrating forces result in injuries from the use of weapons, violent assaults, falls, exposure to harmful substances and environments, and motor vehicle crashes. The “golden hour” is a term often used in trauma to suggest that an injured patient has 60 minutes from time of injury to receive definitive care, after which morbidity and mortality significantly increase (University of Maryland Medical Center, n.d.). According to the Centers for Disease Control and Prevention (CDC), unintentional injury is the 4th leading cause of death for all ages in the United States, (National Center for Health Statistics, 2022).

According to the National Safety Council, the top three leading causes of preventable injury-related death – poisoning, motor vehicle, and falls – account for over 86% of all preventable deaths. Nonfatal emergency department visits are dominated by fall-related injuries, accounting for 33% of all preventable nonfatal injuries. (National Safety Council, 2020)

Time is considered an essential determinant in the initial care of trauma patients, especially for patients suffering neurotrauma and hemodynamically unstable penetrating injuries. (Harmsen, et al., 2015). By the time that trained rescuers arrive on scene, the clock that can definitively impact patient outcomes is already ticking. Location-Based Routing for Wireless 911 Calls has demonstrated its value for getting the best care to injured persons in a timely manner.
While the accuracy of location-based routing can impact patient outcomes at the individual level, more recently, impacts at state and regional levels are now coming into focus for legislators, local officials, and system planners. The applications of geographic information systems (GIS) allow for the tracking and prediction of populations, locations, and infrastructure impacted by natural and man-made disasters and/or where emergency response efforts are needed. Advanced technologies like GIS can inform decisions on where trauma centers are erected, where emergency response assets are stationed, where and how resources are allocated, and what more can be done in the crucial moments that immediately precede and follow the event. (Musa, Keating, & Brutzman, 2019).

According to the Pew Research Center, the vast majority of Americans – 97% – now own a cellphone of some kind. The share of Americans that own a smartphone is now 85%, up from just 35% in Pew’s first survey of smartphone ownership conducted in 2011 (Pew Research Center, 2021).

Recent advances in mapping software have allowed for significant advances in the public health and public safety fields. It is being used to study traumatic injuries to help identify high-risk areas and potential solutions to local injury clusters (Centers for Disease Control and Prevention, 2018). Examples of its use in trauma research include pedestrian injuries and local traffic patterns; sociodemographic characteristics of regions with high incidence of certain kinds of injuries, such as burns; and trauma systems development. In the field of epidemiological research, the importance of quality data cannot be understated.

The ATS, a non-profit national organization with over 3,000 individual and institutional members along with 7,830 advocates of the Trauma Survivors Network, strongly support the Federal Communications Commission (FCC) efforts to ensure “Location-Based Routing for Wireless 911 Calls” to improve the routing of wireless 9-1-1 calls and texts to 9-1-1 call centers.

References


