



October 9, 2019

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Ex Parte Presentation, Wireless 9-1-1 Location Accuracy, PS Docket No. 07-114*

Dear Ms. Dortch,

On October 7, 2019, Brad Gillen, Scott Bergmann and Matthew Gerst of CTIA met with Matthew Berry and Aaron Goldberger of FCC Chairman Ajit Pai's office to discuss the Commission's regulatory framework for providing public safety answering points (PSAPs) with vertical location information for wireless calls to 9-1-1.

During the meeting, CTIA reiterated the wireless industry's on-going commitment to enhancing wireless 9-1-1 location accuracy, particularly indoors, and provided a status update on the nationwide wireless providers' efforts to meet the *Fourth Report and Order's* vertical location requirements. CTIA reviewed the nationwide wireless providers' significant efforts to work across the wireless ecosystem to deliver actionable vertical location information to PSAPs during a wireless 9-1-1 call. However, CTIA noted that third-party adoption and scalability issues remain substantial challenges to National Emergency Address Database (NEAD)-based dispatchable location solutions.<sup>1</sup>

Moreover, given expected advances in commercially available vertical location solutions, CTIA noted the importance of ensuring that the Commission's vertical location framework reflects and incents the on-going evolution of vertical location technology. With regard to Z-axis, CTIA urged the Commission to consider an approach that reflects the nascent and evolving state of commercially available vertical location technologies that will be demonstrated in the upcoming 9-1-1 Location Accuracy Test Bed LLC's Stage Za.<sup>2</sup> CTIA suggested that the Commission's rules should establish the appropriate incentives for the wireless ecosystem and public safety community to work together towards producing the most actionable vertical location information for wireless 9-1-1 calls.

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<sup>1</sup> See Letter from Matthew Gerst, Vice President, Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114 (filed Apr. 26, 2019).

<sup>2</sup> See, e.g. Comments of Google LLC, PS Docket No. 07-114, at 4 (filed May 20, 2019) ("...Google intends to further measure ELS's vertical location functionality by participating in CTIA's Stage Za testbed later this year.").



Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS and provided to the Commission meeting attendees. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Scott Bergmann

Scott Bergmann  
Senior Vice President, Regulatory Affairs

cc: Matthew Berry  
Aaron Goldberger