Ms. Marlene H. Dortch, *Secretary*

Federal Communications Commission

445 12th Street SW

Washington, D.C. 20554

October 10, 2019

*In re* Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems. PS Docket No. 07-114.

Dear Ms. Dortch:

On May 24th, 2013, the undersigned, Daniel Henry, Director of Government Affairs and Regulatory Counsel, along with Director of Technical Issues Brandon Abley, made an *ex parte* presentation to Randy Clarke, Legal Advisor for Wireline and Public Safety for Commissioner Starks.

During our presentation, we discussed 9-1-1’s priorities on the subject of vertical (“Z-axis”) location accuracy, and expressed opposition to CTIA’s “phased-in approach” to implementing the Z-axis location accuracy benchmarks.[[1]](#footnote-1) Emphasizing public safety’s sensitivity to timeline slip, we noted that the proposed benchmarks have been in place since the Commission’s 2015 Roadmap, and that vertical location technology capable of meeting the Commission’s requirements has been in existence since 2013’s CSRIC III[[2]](#footnote-2) — inconsistent with CTIA’s characterization of vertical location solutions as “nascent.”[[3]](#footnote-3)

That said, we agreed with CTIA’s assessment that the National Emergency Address Database (NEAD) faces “substantial challenges” on the adoption and scalability fronts.[[4]](#footnote-4) Further, we remain concerned that the NEAD could generate dangerously inaccurate location results for public safety, and that its compliance regime creates the potential for vast swaths of unserved 9-1-1 callers.

Should you have any questions concerning this presentation, please contact me as below.

Sincerely,

/s/

Daniel Henry

*Director of Government Affairs*

CC: Randy Clarke

1. Notice of Ex Parte Presentation from CTIA, PS Docket No. 07-114 (Sept. 3, 2019). [↑](#footnote-ref-1)
2. CSRIC III Working Group 3 Indoor Location Test Bed Report, March 14, 2013, p. 36, <https://transition.fcc.gov/bureaus/pshs/advisory/csric3/CSRIC_III_WG3_Report_March_%202013_ILTestBedReport.pdf>. [↑](#footnote-ref-2)
3. CTIA Ex Parte. [↑](#footnote-ref-3)
4. *Id*. [↑](#footnote-ref-4)