Ms. Marlene H. Dortch, *Secretary*

Federal Communications Commission

445 12th Street SW

Washington, D.C. 20554

October 21, 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 October 18, 2019, the undersigned, Daniel Henry, Director of Government Affairs, along with Director of Technical Issues Brandon Abley and CEO Dr. Brian Fontes, made an *ex parte* presentation to Erin McGrath, Legal Advisor for Wireless, Public Safety, and International matters for Commissioner O’Rielly.

During our presentation, we discussed 9-1-1’s priorities on the subject of vertical (“Z-axis”) location accuracy, emphasizing our sensitivity to timeline slip on this matter. 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[[1]](#footnote-1) — inconsistent with some characterizations of these solutions as “nascent.”[[2]](#footnote-2)

We agreed with others’ assessments that the National Emergency Address Database (NEAD) faces substantial challenges on the adoption and scalability fronts.[[3]](#footnote-3) Further, while we acknowledged the value of actionable location information, *accurate* location informationis the true “gold standard” for public safety. Accordingly, we noted continued concern that the NEAD and other “dispatchable” location solutions can generate dangerously inaccurate location results, and that the NEAD’s compliance regime creates the potential for vast swaths of unserved 9-1-1 callers. Lastly, we noted that improvements to handsets’ innate ability to calculate z-axis location has benefits to both public safety and commercial location services, opening a potential innovation greenfield.

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

Sincerely,

/s/

Daniel Henry

*Director of Government Affairs*

CC: Erin McGrath

1. 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-1)
2. *See* Letter from Matthew Gerst, Vice President, Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114 (filed Sept. 3, 2019). [↑](#footnote-ref-2)
3. *See* *Id*. [↑](#footnote-ref-3)