

JONES DAY

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October 24, 2019

BY ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

**Re: Permitted Oral *Ex Parte* Notice
Wireless E911 Location Accuracy Requirements
PS Docket No. 07-114**

Dear Ms. Dortch:

On October 22, 2019, representatives of NextNav, LLC (“NextNav”) met with Zenji Nakazawa, legal advisor to Chairman Pai. Participating in the meeting on behalf of NextNav were Gary Parsons, Chairman; Bruce Cox, Senior Director, Regulatory & Public Safety; and the undersigned. Ganesh Pattabiraman, NextNav’s CEO and Co-Founder, also participated in the meeting by telephone.

The discussion focused on the need to adopt promptly a wireless vertical location requirement of +/-3 meters for 80% of wireless calls from z-axis capable handsets. The adoption of a 3 meter metric is important because it effectively provides the correct floor level altitude of the caller’s location. NextNav’s technology is already capable of exceeding a 3 meter requirement, having demonstrated 1.8 meter accuracy for 80 percent of calls in the most recent industry led testbed¹ and NextNav continues to improve its technology.

The parties also discussed the definition of “z-axis capable handsets,” which should include all handsets that have the hardware components necessary to provide vertical location capabilities, regardless of whether additional software may be needed to ensure that the included components can achieve the 3 meter accuracy requirement. This definition would include the below listed handsets, all of which are equipped with barometric pressure sensors. The manufacturers of these

¹ See *Report on Stage Z*, 911 Location Test Bed, LLC PS Docket 07-114, at 120 (Aug. 3, 2018).

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devices account for more than 85 percent of the handsets sold in the United States during the 15 month period between April 1, 2018 and June 30, 2019:²

Manufacturer	Model	Year Released in US
Apple	iPhone 6/6 Plus, 6s/6s Plus	2014/2015
	iPhone 7/7 Plus	2016
	iPhone SE	2016
	iPhone 8/8 Plus	2017
	iPhone X/XS/XS Max/XR	2017/2018
	iPhone 11	2019
Samsung	Galaxy S7, S7e, S7+, S7 Active	2016
	Galaxy Note 7	2016
	Galaxy S8, S8e, S8+, S8 Active	2017
	Galaxy Note 8	2017
	Galaxy S9 S9, S9e, S9+, S9 Active	2018
	Galaxy Note 9	2018
	Galaxy S10 S10, S10e, S10+, S10 Active	2019
	Galaxy Note 10	2019
	Galaxy Fold	2019
	Galaxy A6	2018
	Galaxy J3	2018
LG	V.40 ThinQ	2018
	V.35 ThinQ	2018
	G6 ThinQ	2018
	G8 ThinQ	2019
Google	Pixel 1	2016
	Pixel 2	2017
	Pixel 3	2018
	Pixel 4	2019

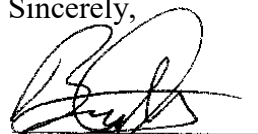
² See Counterpoint Research Data, available at <https://www.counterpointresearch.com/us-market-smartphone-share/> (last visited October 23, 2019).

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Finally, the parties briefly discussed the numerous additional issues that have been highlighted in this proceeding, such as the need to tighten the horizontal location rules for E911 location, the need to ensure that location technologies continue to function during power outages, and the need for the development and demonstration of location technology that can provide the ultimate gold standard of a reliable and precise dispatchable location (*i.e.*, the door to kick down). Although currently available technology is not capable of achieving this objective, it is clearly the ultimate goal of the public safety community and could be addressed in either a further notice of proposed rulemaking or in a referral to the Commission's Communications Security, Reliability, and Interoperability Council ("CSRIC").

Please contact the undersigned if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Olcott", written over a horizontal line.

Bruce A. Olcott