

March 19, 2021

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 March 18, 2021, representatives of NextNav, LLC (“NextNav”) participated in a conference call with Ethan Lucarelli, Acting Legal Advisor for Wireless and Public Safety for Acting Chairwoman, Jessica Rosenworcel. Participating in the call on behalf of NextNav were Ganesh Pattabiraman, CEO and Co-Founder and Gary Parsons, Executive Chairman.

During the calls, the NextNav representatives highlighted their current state of readiness to support public safety and wireless carriers in the provision of highly accurate vertical location information on a near-nationwide basis. Even though the FCC’s April 3, 2021 deadline for wireless vertical location only addresses the largest 25 cellular market areas (“CMA’s), NextNav vertical location network is already operational in more than 4,400 towns and cities, covering more than 90 percent of buildings in excess of three stories throughout the entire United States. This vertical location capability is currently available for public safety first responders through AT&T and FirstNet, but would also serve E-911 upon connection to a carrier’s existing E911 network.

The parties discussed AT&T’s testing and planned near-term integration of NextNav’s capabilities with AT&T’s new E911 server system as noted in AT&T’s waiver filing.<sup>1</sup> More recently, NextNav is also in the process of interfacing with Verizon’s E911 server on a trial basis to facilitate end-to-end testing. These testing and interfacing trials are expected to take place over the next three to four months. The accuracy of NextNav’s vertical location system has been validated in multiple independent testbeds over the years, and NextNav is prepared to certify to carriers that its nationwide network is deployed consistent with the prior test beds and that its accuracy meets or exceeds the required FCC metrics across its entire coverage area.

---

<sup>1</sup> See Petition for Waiver of AT&T Services, Inc., PS Docket No. 07-114 at 13 and 19 (Feb. 12, 2021).

NextNav has also made its software available on a royalty-free basis to work with numerous z-axis capable handsets (*i.e.*, those that include barometric pressure sensors) to enable consumers to benefit from NextNav's vertical location service for E911 purposes. Many of these device manufacturers have tested and adopted this software or are awaiting final carrier direction to complete the process. Such software would be available in new devices from these manufacturers and via over-the-air maintenance release software updates to legacy devices, enabling NextNav's vertical location service to be widely available to both new and existing consumers. This process is consistent with the direction that the Commission provided in the Sixth Report and Order,<sup>2</sup> and specifically meets the Commission's privacy rules.

NextNav recognizes the long-standing desire of public safety for accurate vertical location capabilities, both for first responders themselves and for E911 callers, and understands the urgency in providing this capability as soon as possible. Although the April 3, 2021 deadline that was first mandated in 2015 will not be achieved, it is reasonable to expect that the solutions can be commercially enabled within a three to four month time period.

Thank you for your attention to these matters. Please contact the undersigned if you have any questions.

Sincerely,

/s/ Bruce Cox

Bruce Cox

Senior Director

Regulatory & Public Safety

---

<sup>2</sup> Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, *Sixth Report and Order and Order on Reconsideration*, 35 FCC Rcd 7752, ¶ 42 (2020) (discussing requirement to upload z-axis compliant software into z-axis capable handsets that are able to receive such upgrades).