



April 4, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte Presentation*, RM-11780 and PS Docket No. 07-114

Dear Ms. Dortch:

On April 2, 2018, representatives of APCO, NENA, CTIA and its member companies met with representatives of the FCC's Public Safety & Homeland Security Bureau (Bureau) (identified in Appendix A) to discuss the evolving 9-1-1 ecosystem in which smartphone apps and supplemental data solutions can offer features and capabilities designed to supplement and, in some cases, supplant information provided by wireless carriers with 9-1-1 calls. These supplemental data solutions can offer Automatic Location Information (ALI), routing information, or other data relevant to Public Safety Answering Points (PSAPs) for a wireless 9-1-1 call. To maintain the integrity, reliability and resiliency of the evolving 9-1-1 system, the parties encouraged the Commission to issue guidance to ensure that such solutions are reliable and secure for all stakeholders.

Recently, companies have begun offering supplemental data solutions to PSAPs to trial in live 9-1-1 environments with *real, actual* 9-1-1 calls, without the knowledge of the wireless providers operating in trial areas.¹ Evaluating such solutions in live environments

¹ See, e.g., Press Release, West Corporation, West Announces Results of Wireless 9-1-1 Location Trial with Google (March 6, 2018) (describing a trial of West's Wireless Dispatchable Location Services (WDLS) and Google's Android Emergency Location Services (ELS) technologies that covered more than 2 million people in Florida, Georgia and Washington) <https://westcorporation.gcs-web.com/news-releases/news-release-details/west-announces-results-wireless-9-1-1-location-trial-google>.

may yield important data, but doing so can have consequences for live 9-1-1 calls if not carefully coordinated among 9-1-1 ecosystem stakeholders.²

For this reason, the parties encouraged the Commission to issue guidance so that any testing, trialing or use of 9-1-1 apps or supplemental data solutions do not have unintended consequences that may adversely impact existing 9-1-1 capabilities or create confusion among PSAPs or members of the public. Specifically, the parties recommended that the Commission issue guidance to address the following:

- 9-1-1 stakeholders, including app providers and supplemental data solution providers, should provide **reasonable notice** to the FCC, appropriate state or local public safety authorities, and wireless providers operating within the area of testing, trialing or use of 9-1-1 apps or supplemental data solutions that may impact live 9-1-1 calls; and
- 9-1-1 apps and supplemental data solution providers should **disclose their testing methodology**. Such disclosure will enable stakeholders, including public safety technical experts, wireless providers and the Commission, to assess any potential impact of the solutions. Disclosure will also foster a better understanding of test results to help stakeholders understand the basis for any statements regarding the solution's capabilities. Test methodologies of such solutions should be disclosed in a manner equivalent to the availability of testing methodologies utilized by the 9-1-1 Location Accuracy Test Bed.

Consistent with these guidelines, the parties also discussed how stakeholders can take care to avoid unintended consequences or impact to 9-1-1 services caused by the activities of 9-1-1 apps and supplemental data solutions. Companies offering 9-1-1 apps and supplemental data solutions may not be subject to the same regulations and oversight that the Commission exercises over wireless providers. Accordingly, while wireless providers are responsible for compliance with the FCC's 9-1-1 rules for capabilities and process within their control, 9-1-1 apps and supplemental data solutions have control over their capabilities and processes, including with respect to any consequences to 9-1-1 services.

² See Ryan Knutson, Google Tests System to Help Locate 911 Callers, WALL STREET JOURNAL (Feb. 15, 2018) (describing a test of RapidSOS and Google's ELS technology covering fifty 9-1-1 centers and some 2.4 million people in Texas, Tennessee and Florida, but precluding AT&T's delivery of 9-1-1 location data for about 50,000 9-1-1 calls).

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The parties intend to craft more specific best practices on notice and disclosures for the Commission to consider in offering guidance for any future location and other trials affecting 9-1-1 services. These best practices would help ensure that any new solutions are evaluated fairly and integrated into the 9-1-1 ecosystem in ways that are reliable and secure for stakeholders, including wireless providers, PSAPs and, most importantly, 9-1-1 callers.

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Appendix A – April 2 FCC Meeting Participants

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