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April 22, 2020

VIA ELECTRONIC FILING

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

Re: Wireless E911 Location Accuracy Requirements – PS Docket No. 07-114

Dear Ms. Dortch:

On April 20, 2020, Christi Shewman, Mike Tan, and the undersigned, of AT&T Services, Inc., on behalf of itself and its affiliates (collectively, “AT&T”), met by phone with David Furth, Brenda Boykin, Erika Olsen, and Rasoul Safavian of the Public Safety and Homeland Security Bureau to discuss the above-referenced proceeding.

During the meeting, AT&T responded to questions about its comments filed in response to the Fifth Notice of Proposed Rulemaking in the Wireless Location Accuracy proceeding¹ and its plans to implement technologies to meet the Z-axis benchmarks. In addition, we reiterated an issue previously raised by AT&T² concerning whether carriers could rely on, for compliance purposes, a Z-axis technology dependent on users opting-in and not subsequently opting-out. That is, the ability of the technology to achieve compliant levels of accuracy is wholly dependent on a user’s affirmatively consenting to allow location tracking of their device to aid in calibration, irrespective of whether a 911 call is ever placed by that user’s device.

Finally, we discussed whether the devices on AT&T’s network were Z-axis capable or could become Z-axis capable via a software upgrade. Our analysis shows that many devices do not have barometric pressure sensors, do not have barometric pressure sensors of sufficient quality, or can no longer be pushed software updates. We estimate that only some 26% of Android devices could be considered Z-axis capable and have the capability to be upgraded to support vertical location. And while we believe the majority of Apple devices on our network

¹ See AT&T Reply Comments filed on March 20, 2020, available at <https://ecfsapi.fcc.gov/file/10320399915856/ATT%20Z-Reply%20Comments.pdf>.

² See AT&T ExParte Notice filed on August 17, 2019, available at <https://ecfsapi.fcc.gov/file/10717057092116/Z-axis%20ExParte%20Discussion.pdf>.

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include a barometric pressure sensor, a not-insignificant number of Apple devices may also face limitations in receiving updates.

Sincerely,

/s/ Joseph P. Marx

cc (via email):

Brenda Boykin

Jon Evanoff

David Furth

Erika Olsen

Rasoul Safavian

Ms. Marlene Dortch

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REVIEW

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Law Firm(s)

Attorney/Author Name(s)Joseph P. Marx

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