



LaaSer Critical Communications
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April 23, 2018

VIA ELECTRONIC FILING

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

Re: Ex Parte Notification

PS Docket No. 18-64, Location-Based Routing for Wireless 911 Calls;

PS Docket No. 07-114, Wireless E911 Location Accuracy Requirements

Dear Ms. Dortch:

On April 19th, I met in person with Zenji Nakazawa, Public Safety and Consumer Protection Advisor to Chairman Pai, regarding the above-referenced proceedings.

I provided input and details on progress to date that my company, LaaSer Critical Communications, has made with regard to location-based routing of wireless emergency calls. On this topic, I was able to convey findings about the current state of routing based on input from individual PSAPs and state and regional coordination bodies, testing done in cooperation with wireless carriers and PSAPs, and other field testing. I provided additional details about emerging technologies, such as our own, that demonstrate that device-based location can be used to improve emergency call routing right now.

We also discussed technologies and delivery methodologies for emergency call location more generally. There is a healthy debate going on right now within the public safety community regarding the efficacy and appropriateness of treating emergency caller location as either core information to be delivered alongside call data via existing pathways that begin with the mobile carriers – e.g. Automatic Location Identification (ALI) – or as supplemental data delivered through other methods outside of the call flow. I explained data and use cases where location as supplemental data could be confusing to 9-1-1 calltakers and dispatchers, leading to lost time in handling an emergency call when every second counts. I further described how those issues can be mitigated through delivery of location information in partnership with and through existing carrier core systems.

LaaSer intends to present more detailed data to Public Safety & Homeland Security Bureau staff and Mr. Nakazawa on both routing and location delivery methodology in the near future. This will be done via a response to the recent Notice of Inquiry focused on location-based routing (PSHSB 18-64) as well as meetings with Bureau staff and the Commission. We believe these topics are currently among the most important to public safety and addressing them appropriately can have a very positive impact on the lives of 9-1-1 callers.

/s/ Fred White

Chief Executive Office
LaaSer Critical Communications