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May 13, 2019

VIA ECFS

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

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

Dear Ms. Dortch:

On May 9, 2019, representatives of NCTA – The Internet & Television Association and its members Charter and Comcast met with staff of the Public Safety and Homeland Security Bureau regarding the above-referenced proceeding. Please see Attachment A for a list of meeting participants.

In the meeting, we emphasized that the ability of first responders to quickly and accurately locate 911 callers is extremely important, and the cable industry is committed to helping ensure the reliability of the nation’s 911 communications system. We explained that we have been engaged in ongoing discussions with CTIA related to the National Emergency Address Database (NEAD), and that NCTA members have shared with CTIA their reservations about participation in the NEAD. We also addressed CTIA’s April 26, 2019, filing in this docket that described CTIA’s efforts to bring in additional access point holders as “challenging.”¹

First, we noted that protecting customer privacy is of paramount importance to NCTA’s members, and that the cable industry has subscriber privacy obligations that are separate and distinct from wireless carriers’ responsibilities.² We also discussed significant practical considerations related to collecting and formatting Wi-Fi access point data. We then described our concern that transmission of misleading location information could result in damage to customers’ premises or possible harm to customers. Finally, we shared our concern that a focus

¹ Letter from Matthew Gerst, Vice President, Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114, at 2-3 (April 26, 2019).

² See, e.g., 47 U.S.C. § 551.

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on NEAD-based systems could detract from the widespread implementation of device-based hybrid (DBH) 911 solutions that rely on handset sensors, GPS, and other dynamic location detection technologies to identify a caller's actual location, which were developed after the NEAD framework was proposed and are likely to result in more accurate and reliable location information being available for more calls. NCTA looks forward to continued discussion with the Commission and the wireless industry to address these questions.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Neal M. Goldberg

Neal M. Goldberg

CC: William Beckwith
Nellie Foosaner
David Furth
Rasoul Safavian
Michael Wilhelm

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Attachment A

May 9, 2019, Meeting Participants

NCTA – The Internet & Television Association

Neal M. Goldberg

Renee Gregory, Willkie Farr & Gallagher LLP (outside counsel for NCTA)

Charter

Elizabeth Andrion

Audrey Connors

Comcast

Beth Choroser

Public Safety and Homeland Security Bureau

William Beckwith (by phone)

Nellie Foosaner (by phone)

David Furth

Rasoul Safavian

Michael Wilhelm