



May 21, 2019

Via ECFS

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

Re: Wireless E-9-1-1 Location Accuracy Requirements (PS Docket No. 07-114),  
Dispatchable Location Test Bed Report

Dear Ms. Dortch:

On May 17, 2019, Scott Bergmann and Matthew Gerst of CTIA separately met with Travis Litman and Umair Javed of FCC Commissioner Jessica Rosenworcel's office and Randy Clarke of FCC Commissioner Geoffrey Stark's office. On May 20, 2019, they met with Will Adams of FCC Commissioner Brendan Carr's office. During the meetings, CTIA discussed the Dispatchable Location Summary Report (Report) that was recently submitted to the Public Safety & Homeland Security Bureau to describe the initial evaluation of National Emergency Address Database (NEAD)-based dispatchable location solutions.<sup>1</sup>

Specifically, CTIA reiterated that its member companies are committed to enhancing the location accuracy of wireless 9-1-1 calls, particularly indoors, for Public Safety Answering Points (PSAPs) through innovative solutions. Since 2015, wireless providers have met every location accuracy benchmark and requirement set forth in the *Fourth Report & Order*.<sup>2</sup> To date, the nationwide wireless providers have tested and implemented solutions, such as device-based hybrid (DBH) to meet the Commission's increasing benchmarks for horizontal location accuracy, stood up the NEAD and attained Commission approval for its privacy and security plan, and proposed a vertical metric for z-axis information.<sup>3</sup>

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<sup>1</sup> See CTIA Ex Parte Letter, April 26, 2018 (PS Dkt. 07-114).

<sup>2</sup> *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, 30 FCC Rcd 1259 (2015) (*Fourth Report & Order*).

<sup>3</sup> See, e.g., Press Release, CTIA, Wireless Industry Announces Development in Improving 9-1-1 Location Accuracy, Sept. 5, 2018, <https://www.ctia.org/news/wireless-industry-announces-development-in-improving-9-1-1-location-accuracy> (announcing nationwide wireless providers' adoption of device-based



The Report reflects that NEAD-based DL solutions have achieved the functional capabilities the Commission described in the *Fourth Report and Order*. However, the Report also reflects several implementation challenges that NEAD-based DL solutions face, including handset support and reference point provisioning.

At the meetings, the participants separately discussed the wireless industry's ongoing evaluation of developing commercial location technologies that can meet the Commission's vertical location requirements. As envisioned by the Commission in the *Fourth Report and Order*, 9-1-1 location solutions are more closely aligning with evolving and innovative commercial location solutions.<sup>4</sup> CTIA expressed support for a shared goal among the Commission and the public safety community to enhance 9-1-1 location accuracy, particularly for 9-1-1 calls placed from indoor locations, using the most technologically feasible and effective approach.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS and provided to the Commission meeting attendees. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Matthew Gerst

Matthew Gerst  
Vice President, Regulatory Affairs

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hybrid location technology solutions)(CTIA 9-1-1 DBH Location Announcement); Press Release, CTIA, Wireless Industry Announces Latest Step Toward Enhancing Mobile 911 Location Services, Oct. 4, 2016, <https://www.ctia.org/news/wireless-industry-announces-latest-step-toward-enhancing-mobile-911-location-services> (announcing selection of West's Safety Services to develop and operate the NEAD platform); *Wireless E911 Location Accuracy Requirements*, Memorandum Opinion and Order, PS Docket No. 07-114, FCC 17-150 (rel. Nov. 14, 2017) (approving NEAD Privacy and Security Plan); Public Safety and Homeland Security Bureau Seeks Comment on Vertical (Z-Axis) Accuracy Metric Proposed by the Nationwide Wireless Carriers, Public Notice, DA 18-928 (rel. Sept. 10, 2018); Letter from Scott K. Bergmann, Senior Vice President, Regulatory Affairs, CTIA, *et al.*, Submission of Z-axis Metric and Report, PS Docket No. 07-114 (filed Aug. 3, 2018).

<sup>4</sup> See, e.g., *Fourth Report & Order* ¶ 62.



CC:

Will Adams

Umair Javed

Travis Litman

Randy Clarke