

JONES DAY

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June 14, 2019

BY ELECTRONIC DELIVERY

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

**Re: Permitted Oral *Ex Parte* Notice
Wireless E911 Location Accuracy Requirements
PS Docket No. 07-114**

Dear Ms. Dortch:

On June 12, 2019, representatives of NextNav, LLC (“NextNav”) participated in a meeting with the staff of the Public Safety and Homeland Security Bureau (“PSHSB”). Participating in the meeting on behalf of the Bureau were David Furth, Rasoul Safavian, Ken Carlberg, Erika Olsen, Nellie Foosaner, John Evanoff, and Elizabeth Cuttner, along with their interns Jaime McCoy, Alison Venable, and Natalie Seales. Participating in the meeting on behalf of NextNav were Gary Parsons, Chairman; Ganesh Pattabiraman, CEO and Co-Founder; Bruce Cox, Senior Director, Regulatory & Public Safety; and the undersigned.

The NextNav representatives discussed some of the mechanics of implementing a 3 meter vertical location metric. They expressed support for applying the requirement to all z-axis capable handsets, noting that barometric pressure sensors are already widely deployed in smartphones. Further, the software to calibrate these sensors can be uploaded to many smartphones as a part of an over-the-air update of the operating system. The parties also discussed the possibility of requiring that some percentage of handsets sold after the April 2021 deadline be z-axis compliant and some percentage of older handsets with barometric pressure sensors be made z-axis compliant with over-the-air updates.

The NextNav representatives also discussed the need to add a confidence and uncertainty (“C/U”) requirement for z-axis information, as highlighted by APCO. They also discussed the need to permit wireless carriers to provide z-axis data using height above ellipsoid, detailing the significant impediments that exist in converting such information into a reliable floor number. In addition, the NextNav representatives discussed permitting carriers to comply with the z-axis requirement by providing vertical location information for 80% of buildings in excess of 3 stories

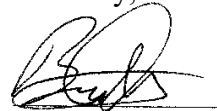
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in the top 25 and 50 cellular market areas (“CMAs”) rather than for 80% of the population in those CMAs.

Finally, the NextNav representatives emphasized the critical need for the Commission to move expeditiously in adopting a vertical location metric of 3 meters in order to ensure its implementation by the April 2021 and 2023 deadlines. The need to facilitate the prompt deployment of the 3 meter vertical option is particularly important given the disappointing test results that were documented by ATIS for the dispatchable location option using the National Emergency Address Database (“NEAD”).

Please contact the undersigned if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce A. Olcott', written over a horizontal line.

Bruce A. Olcott