



703 Hamilton Parkway
Syracuse New York 13214
315.692.0060
csimon@extensionet.com

July 15, 2019

Via ECFS

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

Re: Notice of *Ex Parte*, PS Docket No. 07-114

Dear Ms. Dortch,

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter provides notice that on July 15, 2019, Charles H. Simon, Jr., CEO and Founder, Precision Broadband LLC ("Precision Broadband"), spoke by phone with Erin McGrath, Legal Advisor, Wireless, Public Safety and International to Commissioner Michael O'Rielly.

During this call, we discussed the points made in our filed comments and reply comments to PS Docket No. 07-114.¹ Specifically, the Report and Order for PS-07-114 issued four years ago relied on the promise of the National Emergency Address Database (NEAD) as the source of vertical dispatchable 911 location for calls from wireless phones (Option A). Unlike other rulings by the Commission that are typically technology-agnostic, the 2015 Order specifically referred to the NEAD as the dispatchable vertical location 911 solution and that compliance meant that the NEAD was populated with 25% of the Cellular Market Area (CMAs). As explained in the CTIA's own reports and our comments, the NEAD cannot be expected to fulfill the promises in the 2015 Order. Therefore, we strongly recommend that the definition of, and criteria for compliance with, the vertical dispatchable location option be revisited in this current proceeding at the same time that the Commission seeks to define a metric for the z-axis vertical location option (Option B).

Lastly, we discussed that because there is wide disagreement among commenters about how to address the vertical 911 location problem, industry participants are waiting for direction from the Commission before considering alternative solutions such as the Fixed Broadband 911 system proposed by Precision Broadband. We hope the Commission will proceed more urgently to engage all parties to collaborate on implementing multiple practical solutions.

If you have questions or need additional information, please contact me anytime.

Respectfully submitted,

Charles H. Simon, Jr.

cc: Erin McGrath (via email)

¹ Comments of Precision Broadband LLC, PS Docket No. 07-114 (filed May 20, 2019), *available at* <https://ecfsapi.fcc.gov/file/1052037980575/Precision%20Broadband%20Comments-PS%2007-114%202019-5-20%20.pdf>

Reply Comments of Precision Broadband LLC, PS Docket No. 07-114 (filed June 7, 2019), *available at* <https://ecfsapi.fcc.gov/file/10607227049000/Precision%20Broadband%20Reply%20Comments-PS%2007-114%202019-6-7-Final%20.pdf>