

July 17, 2018

VIA ECFS

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

Re: Notice of Ex Parte Presentation
Precision Broadband LLC
PS Docket No. 18-64

Secretary Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter provides notice that on July 16, 2018, Charles H. Simon, Jr., CEO and Founder, Precision Broadband LLC ("Precision Broadband"), April Heinze, Industry Affairs Specialist, INdigital Telecom, James Kinney, Chief Innovation Officer, INdigital Telecom, and the undersigned, counsel for Precision Broadband LLC (collectively, the "Precision Broadband Representatives"), met separately with:

- (1) Erin McGrath, Legal Advisor, Wireless, Public Safety and International to Commissioner O'Rielly;
- (2) Public Safety Bureau staff that included Austin Randazzo, John Evanoff, Michael Wilhelm, Rasoul Safavian, Brenda Boykin, Christopher Frey, McKensie Meadows, and Erika Olsen; and
- (3) Travis Litman, Chief of Staff and Senior Legal Advisor, Wireline and Public Safety, to Commissioner Rosenworcel.

On July 17, 2018, the Precision Broadband Representatives met separately and on the same matters with:

- (1) Will Adams, Legal Advisor to Commissioner Carr; and
- (2) Zenji Nakazawa, Public Safety and Consumer Protection Advisor to Chairman Pai.

During each of these meetings, the attached handout and redacted version of a presentation were distributed and discussed, along with related points previously made in filed comments.¹ Confidential versions of certain pages of the presentation, which were also presented in each of the meetings, are being submitted with the Commission under the accompanying request for confidential treatment.

Additionally, Precision Broadband emphasized during each of these meetings that it proposes a different – albeit complementary – solution to location-based routing of 911 calls. Precision Broadband’s system leverages the fixed broadband networks of facilities-based Internet Service Providers to provide the same real-time, accurate, dispatchable address location as is provided today with E911 landline telephone service for CMRS wireless calls, as well as a new source of 911 funding. As such, Precision Broadband:

- Invites Commission staff to see a live demonstration of Precision Broadband’s fixed-broadband 911 location system.
- Asks the Commission to use its authority, including opening new proceedings or seeking additional comments on existing proceedings, to engage all facilities-based broadband providers to support 911 location and routing services as a matter of public safety, consistent with these companies’ public safety responsibilities as ISPs and telephone carriers under CALEA and as cable TV providers with respect to supporting the Emergency Alert System.
- Asks the Commission to include fixed broadband-provided location services as part of its device and operating system provider recommendations, along with other solutions offered by other market participants.
- Asks the Commission to recognize that broadband has essentially replaced the landline phone as the “lifeline” service of today and to therefore give serious consideration to supporting the broadband-enabled 911 services contemplated herein along with a 911 fee assessed monthly on broadband services.

If you have questions or need additional information, do not hesitate to contact me.

Respectfully submitted,

s/ Allen C. Zoracki

Allen C. Zoracki
Counsel for Precision Broadband LLC

cc: Erin McGrath (*all via email*)

¹ Comments of Precision Broadband LLC, PS Docket No. 18-64 (filed May 1, 2018), *available at* <https://ecfsapi.fcc.gov/file/1050190070698/Precision%20Broadband%20Comments-PS%2018-64%202018-5-1%20.pdf>.

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