

# NEAD LLC

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July 28, 2017

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TWA325  
Washington, DC 20554

**Re: National Emergency Address Database Privacy and Security Plan  
PS Docket No. 07-114**

Dear Ms. Dortch:

On July 26, 2017, Scott Bergmann, representing the NEAD, LLC, spoke via telephone with Lisa Fowlkes, Chief of the FCC's Public Safety & Homeland Security Bureau to discuss the NEAD Privacy & Security Plan (Plan) submitted in the above-referenced docket.<sup>1</sup> On July 27, 2017, Mr. Bergmann also spoke via telephone with Zenji Nakazawa of Chairman Ajit Pai's office to discuss the Plan.

During the call, Mr. Bergmann discussed how the Plan was developed and designed consistent with the requirements and spirit of the Federal Communications Commission's (FCC) *Wireless E911 Location Accuracy Requirements Fourth Report and Order* (Order).<sup>2</sup> As explained in the Plan, the NEAD Platform includes the NEAD, a database of wireless access point and beacon locations with verified address information that is being developed to support the wireless carriers' provision of dispatchable location information as part of 9-1-1 calls. The NEAD Platform also includes the National Emergency Address Manager (NEAM), a set of systems that will receive, process, and verify information on wireless access points that is submitted for inclusion in the NEAD. NEAD LLC is the NEAD Administrator overseeing the NEAD Platform's development and operation.

Mr. Bergmann also discussed the implementation of the Plan. In developing the Plan, NEAD LLC considered the privacy and security risks associated with the operation of the NEAD Platform. The NEAD Platform has been designed and will be operated in a manner intended to protect individuals' private information and address cybersecurity concerns. As also mentioned in the Plan, an internal operational process will be implemented to assess, audit, and determine compliance with applicable privacy and data security requirements on an ongoing basis. The Plan will be applied starting immediately upon its approval by the FCC.

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<sup>1</sup> Ltr. from Tom Power and Tom Sawanobori of NEAD LLC, Joan Marsh of AT&T, Charles McKee of Sprint, Steve Sharkey of T-Mobile and Will Johnson of Verizon, PS Dkt. 07-114 (submitted Feb. 3, 2017) (NEAD Privacy & Security Plan).

<sup>2</sup> See *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Fourth Report and Order, 30 FCC Rcd 1259 ¶ 69 (2015) ("Order"); see also 47 C.F.R. § 20.18 (i)(4)(iii).

In addition, Mr. Bergmann discussed NEAD LLC's ongoing efforts to operationalize the NEAD Platform to meet the reference point requirements described in the Commission's rules.<sup>3</sup> Wireless carriers' ability to utilize the NEAD to produce dispatchable location information for wireless calls to 9-1-1 is contingent on prompt Commission approval of the Plan.<sup>4</sup> Therefore, Mr. Bergmann encouraged the Commission to approve the Plan expeditiously and provide the certainty needed to help ensure that the NEAD can remain on-track to support the carriers' ability to use the NEAD to produce dispatchable location information for wireless calls to 9-1-1.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/ Matthew B. Gerst

Matthew B. Gerst  
NEAD, LLC

cc Lisa Fowlkes  
Zenji Nakazawa

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<sup>3</sup> See 47 C.F.R. 20.18 (i)(2)(ii)(C)-(D).

<sup>4</sup> See Order ¶ 70.