



July 20, 2018

Michael Wilhelm, Acting Division Chief  
Policy and Licensing Division  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: PS Docket No. 07-114**  
***Wireless E911 Location Accuracy Requirements***  
**Implementation Plan and Progress Report**  
**Cross Wireless, L.L.C. d/b/a Bravado Wireless**

Dear Mr. Wilhelm:

Pursuant to 47 C.F.R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of Cross Wireless, a non-nationwide Commercial Mobile Radio Service provider, is the company's indoor location accuracy Implementation Plan and Progress Report. Cross Wireless is composed of Cross Wireless, L.L.C. and Cross-Valliant Cellular Partnership, commonly owned and controlled Commercial Mobile Radio Service providers that share the same switch, infrastructure and service area.

If questions arise the Commission is welcome to contact the undersigned.

Sincerely,

A handwritten signature in blue ink that reads "Jake Baldwin".

Jake Baldwin  
General Counsel  
MBO/Cross Family of Companies

**Cross Wireless, L.L.C. d/b/a Bravado Wireless**  
**704 3<sup>rd</sup> Avenue**  
**Warner, Oklahoma 74469**

**E911 Location Accuracy Implementation Plan and Progress Report**  
**47 C.F.R. § 20.18(i)(4)(i) and (ii)**  
**PS Docket No. 07-114**

Set forth below is a summary of Cross Wireless' progress toward meeting compliance deadlines prescribed by the Federal Communications Commission in *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, PS Docket No. 07-114, FCC 15-9 (released Fed. 3, 2015) (*Fourth Report and Order*), and codified in 47 CFR § 20.18(i), *et seq.* Also provided is Cross Wireless' Implementation Plan for continuing to meet the Commission's indoor location accuracy requirements. Cross Wireless is composed of Cross Wireless, L.L.C. and Cross Valliant Cellular Partnership.

***Progress Report***

Cross Wireless has worked diligently and covered costs necessary to provide public safety with accurate location data for emergency callers. To date, Cross Wireless has timely performed its *Fourth Report and Order* location accuracy obligations and has submitted compliance documentation to the FCC by the following deadlines:

February 2, 2018

The Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC in PS Docket No. 07-114, providing aggregate live 911 call data covering reporting period July through December 2017. As a non-nationwide CMRS provider that does not provide coverage in any of the six Test Cities, and in accordance with 47 CFR § 20.18(i)(3)(ii)(E), Cross Wireless' 911 live call data was collected and reported based on the largest county its service area footprint. The report was sent to the National Emergency Number Association (NENA), the Association of Public-Safety Communications Officials (APCO) and the National Association of State 911 Administrators (NASNA).

April 3, 2018

In accordance with 47 CFR § 20.18(i)(2)(i)(B)(2), Cross Wireless began to provide dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls.

June 2, 2018

As a non-nationwide CMRS provider that does not provide coverage in any of the six Test Cities, and in accordance with 47 CFR § 20.18(i)(2)(iii), Cross Wireless submitted to the FCC certification that as of April 3, 2018, it did not provide service or report live call data in one or more of the Test Cities, was providing dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls, had deployed the indoor location technology or technologies used in its networks consistently with the manner in which such technologies have been tested in the test bed, and had verified based on its own live call data that it was in compliance with the three-year benchmark set forth at 47 CFR § 20.18(i)(2)(i)(B)(2).

August 1, 2018

Cross Wireless' second Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC in PS Docket No. 07-114 on or before August 1, 2018, providing aggregate live 911 call data covering reporting period January through June 2018, with copies sent to NENA, APCO and NASNA.

Cross Wireless has adopted procedures that comply with FCC indoor accuracy requirements:

Cross Wireless retains for two years all testing and live call data gathered for Non-Nationwide Carrier Live 911 Call Reports, pursuant to 47 C.F.R. § 20.18(i)(3)(iii).

Cross Wireless delivers x- and y-axis (latitude, longitude) confidence and uncertainty (C/U) data for all wireless 911 calls - whether placed from indoors or outdoors - at the request of a Public Safety Answering Point (PSAP), on a per-call basis, with a uniform confidence level of 90 percent, per 47 CFR § 20.18(j).

Cross Wireless collects and retains for two years information on all wireless 911 calls placed on its network, including the positioning source method used to provide a location fix associated with the call. The data is made available to PSAPs upon request in accordance with 47 CFR § 20.18(k).

## ***Implementation Plan***

Cross Wireless plans to continue to meet FCC indoor location accuracy requirements of 47 CFR § 20.18, including subsections (i)(2)(i) and (i)(2)(ii), *i.e.*, horizontal and vertical location. The plan will evolve according to the capabilities and advancements of critical vendors. To this end, Cross Wireless utilizes the expertise of highly qualified providers of E911 technology services.

West Safety Services ("West") provides Cross Wireless with Location Performance Management summarized in an attachment hereto. For thirty years, West has offered the industry reliable, high-quality, voice and data and network infrastructure services. More than 1,000 organizations work with West to access over 6,000 public safety answering points (PSAPs). West helps to

ensure wireless callers have unrestricted access to emergency services, regardless of their location.

Cross Wireless participates in West's Accuracy Compliance Testing program, wherein West performs testing, conducts test calls and updates BSA information. West's accuracy compliance testing capabilities include:

- Test existing PSAP or county locations
- Ensure FCC compliance and reporting
- Achieve BSA optimization
- Measure accuracy drive testing
- Perform BSA generation and calibration
- Perform BSA optimization and maintenance
- Generate calibration test points

Location accuracy data reports provided by West align with ATIS' 05000031 recommendation, which provides the option to blend outdoor accuracy test data with indoor test bed data and live 9-1-1 call data. The reports weight Indoor Test Bed data from Test Bed, LLC by the reporting area's live 9-1-1 call distribution to determine a final location accuracy metric. Sector Morphology assignments are based on the greatest percentage of morphology present in a sector which is then assigned to all 9-1-1 calls from that sector. The data selected for the reporting area's 9-1-1 call distribution utilizes the best final fix for the call, which includes using the first fix when the PSAP did not perform a rebid. This data excludes known test calls. Uninitialized calls, short calls or aborted calls may be excluded in the manual report.

Looking ahead, West expects that advancements in Wireless Location Accuracy will provide cost-effective strategies to provide dispatchable addresses to PSAPs. Technologies installed by a carrier or the customer will help deliver a physical address. For example, residential femtocells provide real time geo-validation of the address and can detect femtocell movement. This dispatchable location and the X/Y location of the femtocell or handset is delivered to the PSAP and displayed on the call taker's console. Enterprise femtocells, which cover definable indoor spaces such as offices and public structures, can provide a level of accuracy comparable to wireline with a dispatchable address. Devices with GPS can reliably validate the address.

Using existing technology, geo-relevant wireless automatic location identification (ALI) provides a dispatchable location associated with the emergency caller. The ALI address data is collected from multiple sources including a user-provided address, public records databases and, potentially, a billing address. An associated nearby address (of a relative or a previously provided address) can provide PSAPs a starting point of investigation. Potentially 15-30% of all wireless 9-1-1 calls using this solution can deliver a dispatchable location.

Bluetooth Low Energy (BLE) Beacons and Wi-Fi already exist in most new smartphones. Dedicated 9-1-1 beacons can provide highly accurate and manageable dispatchable locations. BLE beacon or Wi-Fi addresses can be stored in the National Emergency Address Database (NEAD) and passed to the PSAP at the time of the call. Finally, "Handset Assisted Indoor Location," or "Location Fusion," is being tested in smartphones to sense satellite signals along

with nearby Wi-Fi access points and BLE beacon locations to narrow the location of callers using enabled devices. This solution blends location technologies (such as commercial location detection used by retail stores) in a secure, always-on mode. Implementation of this technology could potentially support VoIP, Voice over Wireless LAN, VoLTE, and CDMA/UMTS voice.

Cross Wireless and West will work to incorporate technological advancements to deliver accurate and useful location information to emergency dispatch personnel. In keeping with FCC timelines, Cross Wireless expects to comply with the following requirements:

**2020**

April 3 - provide to PSAPs either "dispatchable location" or "x/y location within 50 meters," for 70 percent of 911 calls, or extend the deadline based on the timing of Voice over LTE (VoLTE) deployment in the provider's network.

**2021**

April 3 - provide to PSAPs either "dispatchable location" or "x/y location within 50 meters," for 80 percent of 911 calls, or extend the deadline based on the timing of VoLTE deployment in the provider's network.

Cross Wireless will continue to achieve location accuracy progress as technology permits, and it will pursue its plans in future years to enhance the safety of emergency callers inside its service area.

If additional information is required, Cross Wireless will be pleased to provide it upon the Commission's request.



---

Chris Ruhl,  
General Manager / Regulatory Officer

Date:

# **West Safety Services**

## **Executive Summary**

### **Location Performance Management**

West Safety Services' Location Performance Management (LPM) compiles and aggregates complex data sets to help proactively manage and report location accuracy and network performance. LPM arms carriers with key insights to help manage emergency 9-1-1 call locations so it is easier to identify areas for improvement.

With LPM carriers can optimize their networks to the highest accuracy and fastest time-to-first-location fix available and report compliance with accuracy requirements of the Federal Communications Commission (FCC).

LPM consists of two main modules: PERFORMANCE MONITORING TOOL and ACCURACY ANALYSIS REPORTING

LPM'S PERFORMANCE MONITORING TOOL provides a set features that enables the user to perform the following:

- Pinpoint location performance issues
- Optimize network functionality to certify and trust location performance
- Perform proactive risk management of position determination issues
- Provide reports to allow auditing key performance indicators and call results, and analyzing location server performance

LPM'S ACCURACY ANALYSIS REPORTING provides a suite of reports that enables the user to perform the following:

- Report compliance with the FCC's location accuracy rules (Drive testing calls are needed to do this)
- Increase location accuracy across the network
- Generate visual, data-rich, customizable reports
- Measure baseline accuracy results in test areas

West Safety Services' Location Performance Management tool suite also supports cellular network optimization and provides reporting data for Phase II Location Accuracy requirements set forth by the FCC's Fourth Report and Order on E9-1-1 Location Accuracy Requirements<sup>1</sup>.

LPM provides three reports utilized to assess FCC compliance.

- **Live Call Data Report** – This report is provided on a semi-annual basis and provides Live Call Data yields by technology and morphology for any reporting county identified by Cross Wireless.
- **50m Accuracy Report** – This report provides data for the largest county in Cross Wireless' wireless network footprint. Additionally, this report weights the Indoor Test Bed data derived from Test Bed, LLC against Cross Wireless' live 9-1-1 call distribution within the reporting area to determine a final location accuracy metric.
- **PSAP Report** – This Report provides the total number of calls delivered to a specific Public Safety Answering Point and can be generated on demand for a given period as needed.

The compiled data aligns with ATIS' 05000031 recommendation, whereby the option is exercised to blend outdoor accuracy test data with indoor test bed data and Cross Wireless' live 9-1-1 call data.

---

<sup>1</sup> PS Docket No. 07-114, Wireless E911 Location Accuracy Requirements, Fourth Report & Order.