



September 3, 2019

VIA ELECTRONIC FILING

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

Re: Ex Parte Presentation, Wireless 9-1-1 Location Accuracy, PS Docket No. 07-114

Dear Ms. Dortch,

On August 29, 2019, CTIA and nationwide wireless provider member company representatives (participants) met with the Federal Communications Commission's (Commission) Public Safety and Homeland Security Bureau (Bureau) Deputy Chief David Furth and Bureau staff (see Attachment for a list of meeting attendees) to discuss the Commission's regulatory framework for providing public safety answering points (PSAPs) with vertical location information for wireless calls to 9-1-1.

During the meeting the participants reiterated the wireless industry's on-going commitment to enhancing wireless 9-1-1 location accuracy, particularly indoors, and provided a status update on the nationwide wireless providers' efforts to meet the *Fourth Report and Order's* vertical location requirements. CTIA reviewed the nationwide wireless providers' significant efforts to work across the wireless ecosystem to deliver actionable vertical location information to PSAPs during a wireless 9-1-1 call, including via dispatchable location information through the National Emergency Address Database (NEAD) and/or the provision of Z-axis information.

As demonstrated in the April 2019 Dispatchable Location Summary Report (Report) submitted by CTIA,¹ the nationwide wireless providers' extensive investments in NEAD-based dispatchable location solutions have achieved the functional capabilities the Commission described in the *Fourth Report and Order*. However, as the Report observed, the participants noted that third-party adoption and scalability issues remain substantial challenges to NEAD-based dispatchable location solutions.

With regard to Z-axis, the participants again expressed support for the Commission's proposed ± 3 -meter Z-axis metric as an important target to achieve but urged the Commission to consider a phased-in approach that reflects the nascent and evolving state of commercially available vertical location technologies that will be demonstrated in the upcoming 9-1-1 Location

¹ See Letter from Matthew Gerst, Vice President, Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114 (filed Apr. 26, 2019).



Accuracy Test Bed LLC's Stage Za.² CTIA's May 2019 Z-axis comments referred to the Fourth FNPRM's statement that the proposed ± 3 -meter metric "establish[es] a focal point for further testing, development, and implementation of evolving z-axis location technologies."³ The participants continue to hold this view, and reiterate that "testing remain[s] necessary to validate the ability of vertical location technology solutions to meet the proposed ± 3 meter metric, as well as the scalability necessary to meet the Commission's deployment benchmarks."⁴ CTIA has encouraged participation in Stage Za by all vertical location vendors, and Google has committed to participate in Stage Za testing that should begin this month and conclude later this year.⁵

Given expected advances in commercially available vertical location solutions, the participants also noted the importance of ensuring that the Commission's vertical location framework reflects and incents the on-going evolution of vertical location technology. The participants encouraged the Commission to consider the vertical location framework holistically and recognize the challenges identified above. The participants suggested that the Commission's rules should establish the appropriate incentives for the wireless ecosystem and public safety community to work together towards producing the most actionable vertical location information for wireless 9-1-1 calls.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS and provided to the Commission meeting attendees. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Matthew Gerst

Matthew Gerst
Vice President, Regulatory Affairs

² See, e.g. Comments of Google LLC, PS Docket No. 07-114, at 4-11 (filed May 20, 2019).

³ *Wireless E911 Location Accuracy Requirements*, Fourth Further Notice of Proposed Rulemaking, PS Docket No. 07-114, FCC 19-20 ¶ 10 (rel. Mar. 18, 2019) (quoted in Comments of CTIA, PS Docket No. 07-114 at 4 (filed May 20, 2019) (CTIA Comments)).

⁴ CTIA Comments at 4.

⁵ Comments of Google LLC, PS Docket No. 07-114 at 4 (filed May 20, 2019) ("...Google intends to further measure ELS's vertical location functionality by participating in CTIA's Stage Za testbed later this year.")



ATTACHMENT

August 29, 2019 Meeting Attendees

CTIA

Tom Sawanobori

Matthew Gerst

Adam Krinsky, Wilkinson Barker Knauer, LLP

AT&T

Joe Marx

Mike Tan*

Kelly Springer*

Sprint

Ray Rothermel

Jeanna Green*

T-Mobile

Eric Hagerson

Ryan Jensen*

Verizon

Robert Morse

Patrick Donovan*

Susan Sherwood*

FCC

David Furth, PSHSB

Alex Espinoza, PSHSB

John Evanoff, PSHSB

Nellie Foosaner, PSHSB

Erika Olsen, PSHSB*

Rasoul Safavian, PSHSB

Eric Burger, OEA

*Participated via conference bridge