



September 11, 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 September 9, 2019, Scott Bergmann and Matthew Gerst of CTIA met with Zenji Nakazawa of FCC Chairman Ajit Pai's office 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, CTIA 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, CTIA noted that third-party adoption and scalability issues remain substantial challenges to NEAD-based dispatchable location solutions.

With regard to Z-axis, CTIA 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 Accuracy Test Bed LLC's Stage Za.² CTIA's May 2019 Z-axis comments referred to the Fourth FNPRM's

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).

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



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 CTIA continues 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, CTIA also noted the importance of ensuring that the Commission’s vertical location framework reflects and incents the on-going evolution of vertical location technology. CTIA encouraged the Commission to consider the vertical location framework holistically and recognize the challenges identified above. CTIA 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

cc: Zenji Nakazawa

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.”)