November 7, 2018

VIA ELECTRONIC FILING

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

Re: **Ex Parte Presentation,** Receive-Only Earth Stations Operating with the Galileo Radionavigation-Satellite Service Order, IB Docket No. 17-16; Wireless E-9-1-1 Location Accuracy Requirements, PS Docket No. 07-114

Dear Ms. Dortch,

On November 5, 2018, Matthew Gerst of CTIA met via conference bridge with Rachael Bender and Zenji Nakazawa of Chairman Ajit Pai's office, David Furth of the Public Safety and Homeland Security Bureau, Charles Mathias of the Wireless Telecommunications Bureau, Merissa Velez of the International Bureau, and Ronald Repasi of the Office of Engineering & Technology with regard to the above-captioned proceedings.

During the meeting, CTIA expressed appreciation for the Commission's draft Order to allow for use of the Galileo Global Navigation Satellite System (GNSS) for earth stations in the U.S. CTIA noted that the draft Order identifies several public interest benefits that support the use of the Galileo GNSS to supplement U.S. Global Positioning System (GPS), including increased service availability, accuracy, and reliability of location services.[1] Further, the

[1] *Waiver of Part 25 Licensing Requirements for Receive-Only Earth Stations Operating with the Galileo Radionavigation-Satellite Service,* Order, IB Docket No. 17-16, FCC-CIRC1811-01 at ¶¶ 12-16 (draft rel. Oct. 25, 2018) (Draft Order), *available at* https://www.fcc.gov/document/authorizing-galileo-radionavigation-satellite-service.

Commission also finds that use of the Galileo GNSS would not have any adverse impact on the resiliency of the GPS.[2]

CTIA also discussed the draft Order's consideration of the use of the Galileo GNSS to support wireless 9-1-1 location accuracy capabilities.[3] The draft Order describes the beneficial uses of the Galileo GNSS for numerous critical infrastructure purposes, including transportation by land, sea and air, agriculture and food security, mapping, construction, scientific research, financial operations, and power grids.[4] CTIA noted that the significant public interest benefits in supplementing U.S. GPS with the Galileo GNSS for these critical infrastructure purposes apply equally to efforts to enhance wireless 9-1-1 location accuracy capabilities. For this reason, CTIA urged the Commission to explicitly permit the use of the Galileo GNSS for 9-1-1 purposes consistent with the draft Order, subject to the accuracy testing required for other wireless 9-1-1 location accuracy technologies utilized by Commercial Mobile Radio Service (CMRS) providers as described in the Commission's *2015 Fourth Report & Order on Wireless 9-1-1 Location Accuracy*.[5]

[2] Draft Order ¶ 15.

[3] *Id.* ¶ 50.

[4] *Id.* ¶ 14.

[5] *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, 30 FCC Rcd 1259, ¶¶ 126-132 (2015).

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 participants. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Matthew Gerst

Matthew Gerst
Assistant Vice President, Regulatory Affairs

cc: Rachael Bender
Zenji Nakazawa
David Furth
Charles Mathias
Ron Repasi
Merissa Velez