

JONES DAY

51 LOUISIANA AVENUE, N.W. • WASHINGTON, D.C. 20001.2113
TELEPHONE: +1.202.879.3939 • FACSIMILE: +1.202.626.1700

DIRECT NUMBER: (202) 879-3630
BOLCOTT@JONESDAY.COM

November 8, 2019

BY ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

**Re: Permitted Oral *Ex Parte* Notice
Wireless E911 Location Accuracy Requirements
PS Docket No. 07-114**

Dear Ms. Dortch:

On November 6, 2019, representatives of NextNav, LLC (“NextNav”) met with Commissioner Michael O’Rielly and his legal advisor, Erin McGrath, to discuss the above referenced proceeding. On November 7, 2019, the NextNav representatives also met with Travis Litman, Chief of Staff to Commissioner Rosenworcel, and Austin Bonner, legal advisor to Commissioner Starks. Participating in the meetings on behalf of NextNav were Gary Parsons, Chairman; Bruce Cox, Senior Director, Regulatory & Public Safety; and the undersigned. Ganesh Pattabiraman, CEO and Co-Founder, also participated by telephone in the meeting with Litman. During the meeting with Bonner, the attached background presentation was distributed.

The discussions initially focused on the fact that the record has clearly demonstrated that it is technically feasible using the technologies of multiple location service providers for wireless carriers to implement a vertical location metric of +/-3 meters for 80% of wireless calls from z-axis capable handsets by the current deadlines. Further, nearly all representatives of the public safety community have applauded the 3 meter metric as a tremendous benefit to emergency services, describing it as highly actionable and effectively floor level. Even major wireless carriers have expressed support for the adoption of the 3 meter metric and applying it to “80% of all wireless E911 calls made from z-axis capable devices.”¹

The NextNav representatives acknowledged that there is further work to be done, both with horizontal and vertical location determination as well as with address-based approaches such as

¹ See, e.g., Comments of AT&T, PS Docket No. 07-114, at 3 (May 20, 2019).

Marlene H. Dortch
November 8, 2019
Page 2

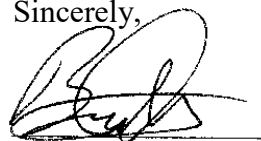
Dispatchable Location. NextNav is sympathetic to APCO's desire to receive "an estimated floor level"² along with vertical altitude information. Unfortunately, the provision of a name or number for estimated floor level is simply not technically feasible with current technology and available building databases. As NextNav and others have explained previously, a number of technological hurdles must first be overcome, including the surveying and electronic mapping of tall buildings in order to address variations in ceiling heights and floor numbering conventions (such as skipping the 13th floor).

In addition, even near-perfect vertical location data cannot be converted into a floor number unless the associated horizontal location is sufficiently accurate. The FCC's current rules require horizontal location information be provided with an accuracy of within 50 meters for 80% of calls. In urban environments, search areas with a 50 meter radius (in essence, a football field in diameter) usually encompass multiple buildings. Improving horizontal accuracy represents an appropriate topic for the Further Notice, and likely should also be referred to the Commission's Communications Security, Reliability, and Interoperability Council ("CSRIC") for technical assessment. However, virtually no record exists within the current rulemaking to support establishing new, more aggressive horizontal accuracy metrics.

Therefore, NextNav explained that the Commission's consideration of further improvements in both vertical *and* horizontal accuracy, alternatives or improvements to Dispatchable Location technologies, as well as location reliability concerns (such as performance in power outage situations), should be explored in the Further Notice. More immediately, the Commission should promptly adopt its long-studied 3 meter vertical metric in order to permit the wireless industry to complete its implementation by the April 2021 and 2023 deadlines.

Please contact the undersigned if you have any questions about this matter.

Sincerely,


Bruce A. Olcott

² See Letter from Jeffrey S. Cohen, APCO Chief Counsel, and Mark S. Reddish, APCO Senior Counsel, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket 07-114, at 1 (Nov. 4, 2019).