

JONES DAY

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November 15, 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 12, 2019, representatives of NextNav, LLC (“NextNav”) provided a demonstration of its highly accurate vertical location technology to Commissioner Brendan Carr and his legal advisor, Will Adams, inside One Tysons Place, a 20 story office building in McLean, Virginia. Participating in the demonstration on behalf of NextNav were Gary Parsons, Chairman, Bruce Cox, Senior Director, Regulatory & Public Safety and Deepak Joseph, Senior Director, Product Management.

The demonstration affirmed the conclusions of the draft Fifth Report and Order that it is technically feasible to identify the vertical location of wireless callers within +/-3 meters for 80 percent of wireless calls to E911 from z-axis capable handsets.¹ NextNav’s technology has been demonstrated to exceed this requirement, having achieved 1.8 meter accuracy (significantly less than floor level) for 80 percent of calls in an industry led testbed.² The demonstration also highlighted complexities associated with conversion of vertical altitude to floor number without horizontal accuracy significantly better than the current 50 meter requirement (since adjacent buildings with different floor configurations lay within the 50 meter horizontal radius). The parties also discussed the other significant benefits of NextNav’s technology, including its optimal configuration to address privacy concerns, in particular NextNav’s retention of pressure sensor offset information only rather than user location.

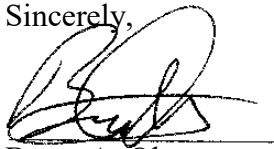
¹ Wireless E911 Location Accuracy Requirement, PS Docket No. 07-114, *Fifth Report and Order and Fifth Further Notice of Proposed Rulemaking*, FCC-CIRC1911-02, ¶ 9 (Oct. 29, 2019).

² See *Report on Stage Z*, 911 Location Test Bed, LLC PS Docket 07-114, at 120 (Aug. 3, 2018).

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The NextNav representatives also emphasized that the Commission's draft Fifth Report and Order constitutes a significant and long awaited victory for public safety and the general public, finally codifying a 3 meter vertical location accuracy requirement more than half a decade after the Commission tentatively concluded that the implementation of this metric was both technically feasible and necessary to support the critical needs of public safety.³

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

Sincerely,

By: _____
Bruce A. Olcott

³ See *Third Further Notice*, ¶¶ 73-74 (proposing to adopt a vertical accuracy requirement of 3 meters for 67 percent of indoor wireless 911 calls within three years, increasing to 80 percent of indoor wireless 911 calls within five years, and tentatively concluding that a 3 meter vertical location metric is technically feasible within the proposed implementation deadline and would be “effectively requiring floor level information” as required by public safety).