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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

November 20, 1997

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Ex Parte Presentation in CC Docket  
No. 94-102 Revision of the Commission's  
Rules to Ensure Compatibility with  
Enhanced 911 Emergency Calling Systems

Dear Ms. Roman Salas:

Today Kent Sander, President and Chief Operating Officer, and Michael Amarosa, Vice President, Public Affairs, of TruePosition, Inc. and Robert Cohen, National Strategies, Inc. and I met with Peter Tenhula, Legal Advisor to Commissioner Michael Powell, to discuss the FCC's E911 policies for the wireless industry. The substance of the conversation is reflected in the attached document.

Sincerely,



Philip L. Verveer

Enclosure

cc: Peter Tenhula

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**TruePosition™**  
Wireless Location System

November 20, 1997  
CC Docket No. 94-102

## **WIRELESS E9-1-1 DEMANDS THE CALLER'S TRUE POSITION**

- E9-1-1 Report and Order (CC Docket No. 94-102): wireless location solution by 2001
- TruePosition provides the 2001 solution today
- TruePosition is a wireless technology company based in Vienna, Va. and Wayne, Pa.
- Owned by The Associated Group
- TruePosition has invented the first automatic location system for wireless subscribers
- Technology based on patented Time Difference of Arrival (TDOA)
- Successful full field test over 350 square miles in New Jersey; successful test in Houston
- Polling shows that "safety sells"-- People willing to pay more for wireless location service

## **Public Safety Needs Wireless 9-1-1 Location**

- Karen Nelson: 40 hours. Marie McAvoy: less than 2 minutes
- 60,000 wireless calls to 911 per day -- growing very fast
- Over 52 million wireless subscribers today; may be over 100 million by the end of 2001
- Not knowing location means we can't find people in trouble
- Coming PSAP meltdown: huge growth in calls without location means more time, wasted resources, dispatching multiple units
- Benefits of wireless location: get police and medical onto the scene faster
- Number of people who die on highways before care begins has risen significantly
- NHTSA auto data: average crash-to-care time for people who died in rural areas -- over 50 minutes; in urban deaths -- 30 minutes.
- 9 minutes saved in crash-to-care time could save 3,000 lives annually
- Technology exists; PSAPs will demand it; poll shows customers will demand it and are ready to pay extra for it

## **What Is Needed**

- **Regulatory certainty: Carriers and vendors will not make the investments if goal posts are moving**
- **Include in coming reconsideration order that 2001 date will not change**
- **Public leadership by Commission on practical implementation issues**
  - coordinated state plans, not 15,000 solutions**
  - cost recovery that makes business sense**
  - states moving to apply Good Samaritan to wireless**