



September 26, 2014

VIA ELECTRONIC SUBMISSION

EX PARTE NOTICE

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

Re: In The Matter Of Wireless E911 Location Accuracy Requirements, Third Further
Notice Of Proposed Rulemaking, P.S. Docket No. 07-114

Dear Ms. Dortch:

On September 24, 2014, the undersigned, along with John Snapp, Intrado Senior Technical Officer, met with David Simpson, Rear Admiral, USN (ret.), Bureau Chief, Public Safety and Homeland Security Bureau (the "Bureau"); David Furth, Deputy Bureau Chief, Public Safety and Homeland Security Bureau; Tim May, E911/NG911 Projects Manager, Public Safety and Homeland Security Bureau; Behzad Ghaffari, Systems Engineering Chief; Rasoul Safavia, Chief Technologist; Dana Zelman, Attorney Advisor; Eric Ehrenreich, Attorney Advisor; and James Wiley, Honors Attorney.

Attendees discussed location technology issues raised in the above-referenced docket and in relation to the four priorities governing 911 indoor location accuracy announced by Commissioner Rosenworcel at APCO in New Orleans on August 6, 2014.¹ Specifically, Mr. Snapp explained the reasons why reverse geo-coding of x,y coordinates - used to identify a "dispatchable" address - involves a degree of address location error that often results in a failure to meet public safety's needs. Intrado shared the results of its proprietary study showing the errors introduced through utilization of geo-coding. Attendees discussed Intrado's views about how marginal increases in traditional E911 location technologies are unlikely to provide the level of accuracy expected by public safety agencies; yet improvements to underlying base mapping could substantially improve the accuracy of a dispatchable address. The discussion included the importance

¹ See TRDaily article dated August 6, 2014.

of making sure public safety officials understand “degrees of uncertainty” and that geo-coding is only as accurate as the base maps this technique utilizes.

Attendees also discussed alternative location technologies (aside from those designed to increase x,y coordinate accuracy via traditionally-utilized means) that are capable of near- and mid-term deployment (in advance of more traditional technologies) as well as long-term deployment; and they discussed improving x,y location accuracy through the utilization of commercial location technologies available on handsets today and in the near future. The discussion also included the interrelation between E911 location technologies with that of NextGen 911.

Mr. Snapp also addressed the Bureau’s separate questions related to notification of PSAPs in a situation where text-to-911 service is interrupted at the text control center (TCC) or via software failure, procedural mistake, or for other reasons.

Please contact me if you have any questions or concerns.

Sincerely,

/s/

Craig W. Donaldson
Senior Vice President
Regulatory & Government Affairs

cc: David Simpson
David Furth
Timothy May
Behzad Ghaffari
Rasoul Safavia
Dana Zelman
Eric Ehrenreich
James Wiley