

JONES DAY

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September 30, 2014

VIA ELECTRONIC FILING

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

Re: Permitted Oral *Ex Parte* Notice
PS Docket No. 07-114

Dear Ms. Dortch:

On September 26, 2014, representatives of NextNav, LLC (“NextNav”) participated in two meetings at the Commission to discuss the above referenced proceeding. The first meeting was with staff of the Public Safety and Homeland Security Bureau (“Bureau”). Participating in the meeting on behalf of the Bureau were Rear Admiral David Simpson, Chief of the Bureau; David Furth, Deputy Bureau Chief; Timothy May; Dana Zelman; and Rasoul Safavian. In the second meeting, the NextNav representatives met with Daniel Alvarez, legal advisor to Chairman Thomas Wheeler, and with David Furth. Participating in both meetings on behalf of NextNav were Gary Parsons, CEO of NextNav; Bruce Cox, Senior Director, Regulatory & Public Safety for NextNav; and the undersigned.

In the meeting with Alvarez, the NextNav representatives highlighted progress in developing its indoor location network, including its recent \$70 million round of new investment by existing and new institutional investors. NextNav has also completed optimization and certification of its beacon transmitters, and is participating in the work of major standardization bodies to standardize its underlying technology. Although NextNav is currently operating an initial network in 47 major urban areas and has mapped out its full beacon transmitter locations for most major cities, these build out designs are based on ensuring compliance with the Commission’s proposed requirement of horizontal accuracy within 50 meters and vertical accuracy within 3 meters for 80 percent of calls, and NextNav’s final construction is therefore awaiting final adoption of these metrics by the Commission.

During both meetings, the NextNav representatives discussed the comprehensive record that has been developed in the indoor location accuracy proceeding. Both from a horizontal and vertical accuracy perspective, the parties discussed the demonstrated results that have been

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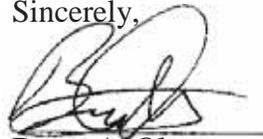
achieved by various technologies, both as part of the formal CSRIC test proceedings as well as in separate, independent testing. The accelerating penetration of barometric pressure sensors in consumer handsets was also noted as well as various approaches for local calibration of such sensors to provide accurate altitude measurements.

NextNav representatives also discussed the positive attributes and challenges of trying to achieve a dispatchable address solution using small cells or distributed antenna systems (“DAS”) deployed by carriers, or relying upon unmanaged devices such as Wi-Fi and Bluetooth beacons outside of carrier control. The parties discussed the long-term nature of efforts that rely upon initiatives by state legislatures, building code administrators, and independent commercially-focused entities, rather than the Commission and licensed wireless network providers.

Finally, the parties discussed positive efforts to address carrier implementation concerns, including the potential for staged rollout of new indoor location compliant handsets (as proposed by NENA¹), a staged geographic rollout based on population density (as proposed by rural carriers² and Verizon³) to address areas of critical need first.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,



Bruce A. Olcott
Counsel to NextNav, LLC

¹ Reply Comments of NENA, PS Docket No. 07-114, at 17 (July 14, 2014).

² *See, e.g.*, Reply Comments of NTCA PS Docket No. 07-114, at 7 (July 14, 2014); Comments of the Rural Wireless Association, PS Docket No. 07-114, at 5-6 (May 12, 2014).

³ Comments of Verizon, PS Docket No. 07-114, at 24-25 (May 12, 2014).