



WASHINGTON, DC

DAVID D. RINES
202.416.6751
DRINES@LERMANSENTER.COM

October 17, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114;
Notice of *Ex Parte* Presentation**

Dear Ms. Dortch:

On October 15, 2014, Michael Rosenthal and Kristin Dial of Southern Communications Services, Inc. d/b/a SouthernLINC Wireless (“SouthernLINC Wireless”) and David Rines of Lerman Senter PLLC met with David Furth, Timothy May, David Siehl, Eric Ehrenreich, Rasoul Safavian, Behzad Ghaffari, Erika Olsen (via telephone), and Dana Zelman (via telephone) of the Public Safety and Homeland Security Bureau to discuss the proposals in the Commission’s *Third FNPRM* regarding its wireless E911 location accuracy rules.¹

In this meeting, SouthernLINC Wireless stated that it agrees with the Competitive Carriers Association, CTIA, and other commenters responding to the *Third FNPRM* that the adoption of new location accuracy standards at this time would be premature. SouthernLINC Wireless expressed its concern that the various technologies and solutions discussed in the record of this proceeding have not been sufficiently tested and have not been sufficiently proven under “real world” conditions to serve as the basis for new performance requirements. In particular, SouthernLINC Wireless noted that concerns have been raised regarding the methodology and results of the CSRIC III test bed in San Francisco for indoor location accuracy.² SouthernLINC

^{1/} *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Third Further Notice of Proposed Rulemaking, FCC 12-149 (rel. Feb. 21, 2014) (“*Third FNPRM*”).

^{2/} Specifically, as SouthernLINC Wireless noted in its reply comments filed in this docket on July 14, 2014, the National Institute of Standards and Technology (“NIST”) criticized the methodology used for the CSRIC III test bed, expressing concern that “the size of the data set used in the San Francisco tests might have been too small” to produce statistically valid data. *See Final Report, Specification for Indoor Location Accuracy Test Bed*, Working Group 1,



Wireless further noted that indoor location accuracy can be affected by a number of variables – including, but not limited to, the increasing use energy-efficient reflective windows – that have not been adequately analyzed or accounted for in the various studies currently on the record.

SouthernLINC Wireless discussed with the Bureau its plans for the transition of its network and system from an iDEN platform to an LTE platform and discussed issues regarding the acquisition and delivery of E911 location data in both its current network environment and in the anticipated LTE environment. SouthernLINC Wireless urged the Commission to refrain from requiring carriers to retrofit legacy networks to comply with any new location accuracy performance requirements that may be adopted, as this would result in the unnecessary diversion of substantial resources and the stranding of significant investments. Moreover, technology solutions are unlikely to be developed or made available for legacy platforms as manufacturers and vendors shift their efforts and focus to LTE.

SouthernLINC Wireless also expressed its concern that the timeframes proposed by the Commission for the new location accuracy requirements described in the *Third FNPRM* are unrealistic and not achievable. As discussed throughout the record of this proceeding, the Commission’s proposed timelines do not account for the time needed for new location technologies to be fully tested (including rigorous field testing under real-world conditions) and incorporated into industry standards before they even become available for deployment. SouthernLINC Wireless described the challenges it faced during its deployment of E911 Phase II and stated that the Commission’s proposed timeframes fail to account for the significant amount of time that will be needed to get handsets capable of utilizing the new location technologies into the hands of a sufficient number of customers.

Finally, SouthernLINC Wireless stated that if the Commission should proceed with adopting its proposed new location accuracy requirements, the Commission should also establish staggered implementation and compliance timeframes for smaller regional and rural carriers who have more limited resources than the nationwide carriers and who frequently find themselves “pushed to the end of the line” in their efforts to obtain needed technology, equipment, and vendor support.



Marlene H. Dortch

October 17, 2014

Page 3

In accordance with the Commission's rules, one copy of this *ex parte* notice is being filed electronically for inclusion in the record of this proceeding.

Very truly yours,

/s/ David D. Rines

David D. Rines
Lerman Senter PLLC
Counsel to SouthernLINC Wireless

cc: David Furth
Timothy May
David Siehl
Eric Ehrenreich
Rasoul Safavian
Behzad Ghaffari
Erika Olsen
Dana Zelman
Michael D. Rosenthal
Kristin H. Dial