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ATTORNEYS AT LAW

October 17, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114

Dear Ms. Dortch:

On October 15, 2014, Chris Pearson, President of 4G Americas and Patricia Paoletta of Harris, Wiltshire & Grannis LLP met with Commissioner Mike O'Rielly and Legal Advisor Erin McGrath to discuss more immediate ways to improve indoor location accuracy for emergency calls than that proposed by the Commission in the *Wireless E911 Location Accuracy Requirements* proceeding.[1] 4G Americas is a trade association dedicated to supporting the deployment of 4G mobile broadband technologies throughout the Americas.

During the meeting with Commissioner O'Rielly, 4G Americas reiterated points made in its ex parte letter of August 11, 2014 in the same docket.[2] 4G Americas noted that it is a partner in the Third-Generation Partnership Project (3GPP) to ensure that the development of standards, including those for emergency service, result from broad and thorough deliberation, and that several of 4G Americas members are participating in the study item at 3GPP to improve indoor position accuracy for emergency calling.[3]

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1 *Wireless E911 Location Accuracy Requirements*, Third Further Notice of Proposed Rulemaking, FCC 14-13, 29 FCC Rcd. 2374, PS Docket No. 07-114 (rel. Feb. 21, 2014) ("*Third FNPRM*").

2 Letter from Patricia J. Paoletta, Counsel, 4G Americas, to Marlene Dortch, Secretary, FCC, PS Docket No. 07-114 (Aug.11, 2014).

3 3GPP, REVISED SID: STUDY ON INDOOR POSITIONING ENHANCEMENTS FOR UTRA AND LTE, Sept. 12, 2014, http://www.3gpp.org/news-events/3gpp-news/1628-rel13, (last visited Oct. 17, 2014).

Relative to the Commission's proposed indoor accuracy requirement that wireless carriers provide location estimates within 50 meters of a caller for 67 percent of calls within two years, and for 80 percent of calls within five years, as well as provide z-axis information within 3 meters of a caller for 67 percent of calls within three years and 80 percent of calls within five years, Mr. Pearson referenced a demonstration that Cisco Systems had provided at 4G Americas' annual technology briefing the day before in Washington D.C. In the demo, Cisco showed the triangulation of Wi-Fi access points providing accuracy within 7 meters, and a dispatchable address that includes a floor number.[4] Per the Cisco demonstration, this dispatchable address solution could possibly be available sooner than the timeframes proposed by the Commission, for the enterprise context. Other 4G Americas members are likewise exploring leveraging the deployed base of location-based systems to provide more accurate information to the PSAPs, including a floor address with a street address, or are testing 4G LTE Observed Time Difference of Arrival ("OTDOA"), which is part of the LTE standard. All of the major carriers have committed to implement OTDOA as they move to Voice over LTE ("VoLTE").

4G Americas reiterated that industry, public safety, and the Commission should focus their efforts to improve location estimates for emergency calls on a dispatchable address solution. Location accuracy solutions that rely on latitude and longitude will never reach the level of accuracy needed to provide a dispatchable address with accurate floor location. Even a 50 meter search radius cannot provide public safety with location information that is guaranteed to be in the same building—or even the same block—as the caller.

A small cell solution—provisioning addresses into Bluetooth beacons, WiFi access points, or distributed antenna systems ("DAS")—may hold the most promise for providing dispatchable addresses to public safety. 4G Americas recognizes that much work is required to implement such a solution—stakeholders must undertake development of the appropriate database methodology to ensure the information is accessible and useable by carriers, as well as develop a means of ensuring such addresses are updated and validated as necessary. And of course, the small cells themselves must be deployed and provisioned by premises owners, potentially in partnership with local government and public safety involvement.

4G Americas requested Commissioner O'Rielly to ensure the Commission allows the industry sufficient time to ensure a more deliberate process, with multi-stakeholder input, to move toward a true, dispatchable address solution. Otherwise, the industry will waste resources on mandates for narrowed search radii that may not serve the public's interest. Our focus should be on the future—and, in particular, on the transition to IP networks and Next Generation 911—rather than on continued regulation of legacy networks and equipment that strands investment.

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[4] *See* letter from Mary L. Brown, Senior Dir. Gov't. Affairs, Cisco Systems Inc., to Marlene Dortch, Secretary, FCC, ex parte presentation, PS Docket No. 07-114, GN Docket No. 11-117, WC Docket No. 05-196 (Oct. 16, 2014).

Mr. Pearson and Commissioner O'Rielly also discussed developments with respect to the International Telecommunications Union, and the importance of regionally-harmonized positions in the Organization of American States' Committee on International Telecommunications, as the U.S. participates in international conferences. Mr. Pearson noted that U.S. decisions, including on Internet regulation, are closely monitored by other regulators in the Region. U.S. regulatory decisions can have an impact first throughout the Americas and through the global eco-system.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Patricia Paoletta
Counsel to 4G Americas

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