



## Texas 9-1-1 Alliance

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October 27, 2014

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Wireless E9-1-1 Location Accuracy Requirements, PS Docket No. 07-114  
Technology Transitions Policy Task Force, GN Docket No. 13-5

Dear Ms. Dortch:

On Friday October 24, 2014, the individuals listed herein from the Texas 9-1-1 Alliance ("Alliance"), the Municipal Emergency Communications Districts Association ("MECDA"), and the Commission on State Emergency Communications ("CSEC"), collectively the "Texas 9-1-1 Entities," met ex parte via a conference call with David Furth, Erika Olsen, Tim May, Dana Zelman, and James Wiley from the Public Safety & Homeland Security Bureau. The individuals from the Texas 9-1-1 Entities were James Goerke (Alliance), Melissa Tutton (MECDA), Patrick Tyler (CSEC), and myself. Also on the conference call by invitation of the Texas 9-1-1 Entities were Trey Forgety and Roger Hixson from the National Emergency Number Association ("NENA"). The purpose of the conference call was to discuss indoor wireless E9-1-1 location accuracy in the context of using validated civic address Automatic Location Identification ("civic address ALI") for 9-1-1 location information instead of merely x, y coordinates from these fixed or portable Wireless Home Phones ("WHP") and femtocells, and also potentially using the same available information for 9-1-1 call routing in these cases consistent with the initial and reply comments filed by the Texas 9-1-1 Entities on these issues in PS Docket 07-114.

It was noted that with regard to the WHP issue, no wireless carrier (as a wireless carrier) has yet to our knowledge deployed for these fixed or portable nomadic devices any of the three existing current civic address ALI provisioning methods (i.e., legacy wireline static civic address ALI; ESQK civic address ALI in use for fixed and nomadic VoIP; and ESRKs which appear to have been used in the past for services, such as T-Mobile@Home service). However, it was noted that Verizon in its non-wireless company capacity, is believed to be using a legacy wireline civic address ALI solution for its Voice Link service, and that in Docket No. 13-5, AT&T indicated an intent to deploy civic address ALI for WHP at some point. It was also noted that while WHP is an increasing growing market segment at the moment separate from AT&T's PSTN to IP transition, the upcoming PSTN to IP transition may make civic address ALI for WHP the threshold issue of importance on wireless indoor location accuracy for some rural Texas areas.

It was noted that in contrast to WHP were no wireless carrier (as a wireless carrier) has yet to our knowledge deployed any of the three existing civic address ALI provisioning methods for WHP, AT&T is provisioning civic address ALI for its femtocell product but Verizon and Sprint have not done so for their respective femtocell product. The different approaches taken by these wireless carriers about whether to include civic address ALI was noted as an example of growing concern on how core 9-1-1 location information may vary on the use of civic address ALI and merely x, y coordinates in the absence of additional Commission rule requirements or clarifying specificity.

The attached handout was used to provide general background on the WHP and femtocell issues in the context of E9-1-1 location accuracy (see, pages 2 to 11); to discuss and potentially answer any questions on the suggested additional 20.18 rule language in Appendix B of the Texas 9-1-1 Entities Reply Comments (see, page 12); and to explain that if wireless carriers (as wireless carriers) were to start provisioning civic address ALI with any one of the three existing civic address ALI provisioning methods, there could be potential tradeoff considerations on some relevant issues between the three existing civic address ALI provisioning methods.

In accordance with the Commission's rules, this letter and attached handout are being filed electronically with the Secretary for inclusion in the public record.

Sincerely,

A handwritten signature in black ink that reads "Richard Muscat". The signature is fluid and cursive, with the first name being more prominent.

Richard Muscat  
Director of Regulatory Affairs  
Bexar Metro 9-1-1 Network District

Enclosures

cc: David Furth  
Erika Olsen  
Tim May  
Dana Zelman  
James Wiley