

JONES DAY

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November 7, 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 November 5, 2014, representatives of NextNav, LLC (“NextNav”) participated in four separate meetings with legal advisors for the FCC Commissioners to discuss the above referenced proceeding. Meeting participants included Louis Peraertz, legal advisor to Commissioner Mignon Clyburn; David Goldman, Senior Legal Advisor to Commissioner Jessica Ronsenworcel; Branden Carr, legal advisor to Commissioner Ajit Pai; and Erin McGrath, legal advisor to Commissioner Michael O’Rielly. Participating in the meetings on behalf of NextNav were Gary Parsons, CEO of NextNav; Ganesh Pattabiraman, President and Co-Founder of NextNav; Bruce Cox, Senior Director, Regulatory & Public Safety for NextNav; and the undersigned.

The NextNav representatives discussed the capabilities of the NextNav technology to support indoor location accuracy at levels of precision that meet or exceed those proposed by the Commission in its Further Notice. The meeting participants also identified and discussed other location technologies that can fulfill the Commission’s proposed indoor location requirements.

The NextNav representatives also highlighted reasonable measures that could be adopted by the Commission to phase implementation of the proposed indoor location accuracy rules and ease compliance for wireless carriers and other stakeholders. Phased implementation measures could include a 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

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).

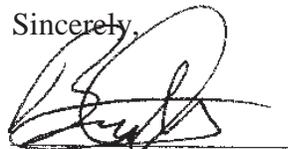
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and Verizon³) to address areas of critical need first, ATIS-based representative compliance testing, including county-wide averaging, and appropriate safe harbor protections for compliant carriers. Although the Commission's two and five year milestones constitute crucial benchmarks to validate progress, modest extensions of these deadlines could also be considered for small carriers or for very small cities and rural markets where the demand for multistory indoor location are less pronounced.

NextNav representatives also discussed the potential for incorporating dispatchable address solutions utilizing Wi-Fi and Bluetooth devices registered by third parties in a voluntary location database ("VLD").⁴ These approaches, although outside the control of the Commission and carriers, should be encouraged, and when populated with location information, could be available for carrier use in compliance testing. Because the cost and obligation of deployment, registration, and maintenance of such devices would fall to landlords, building owners, or the public at large, such devices are unlikely to provide location information for more than an exceedingly small percentage of emergency calls for the foreseeable future. Nonetheless, the Commission's proposed rules could be modified to allow carriers the flexibility to validate location accuracy performance during compliance testing using any combination of X/Y/Z technology or dispatchable location (address/room) technology. Thereby, the carriers could supplement wide-area indoor location solutions that can provide coverage for the entire population (such as GNSS/OTDOA/MBS/UTDOA) with more incremental building-by-building solutions as they hopefully expand through voluntary installation and registration in later years.

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

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

⁴ See Letter from Kim Robert Scovill, counsel to Intrado, to Marlene H. Dortch, Secretary, Federal Communications Commission, Ex Parte Notice, PS Docket No. 07-114, at 1 and Attachment at 4-11 (Oct. 30, 2014); Letter from Mary L. Brown, Senior Director, Government Affairs, Cisco Systems, Inc., and Timothy J. Lorello, SVO, Chief Marketing Officer, TeleCommunication Systems, to Marlene H. Dortch, Secretary, Federal Communications Commission, Ex Parte Notice, PS Docket No. 07-114, Attachment at 8-10 (Oct. 16, 2014).