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November 10, 2014

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Ex Parte

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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 November 6, 2014, Adam Koeppe, Lawrence Rybar, Susan Sherwood, Nneka Chiazor, Gregory Romano and Robert Morse of Verizon met with David Simpson, David Furth, Michael Connelly, Eric Ehrenreich, Tim May, Rasoul Safavian, David Siehl, James Wiley, and Dana Zelman of the Public Safety and Homeland Security Bureau to discuss issues in the above referenced proceeding.

Verizon described its ongoing, near-term efforts to improve indoor location accuracy for its customers. These efforts include plans to offer handsets with Assisted GNSS (A-GNSS) capability to customers and to incorporate and activate Orthogonal Time Difference of Arrival (“O-TDOA”) technology throughout its LTE coverage area. Verizon described the technical capabilities and features of O-TDOA that will achieve significant improvements in indoor location accuracy on VoLTE-originated 911 calls compared to the current Assisted GPS (A-GPS) technology used for its legacy CDMA network. Verizon also discussed ongoing efforts at the Alliance for Telecommunications Industry Solutions (ATIS) to develop and finalize the testing methodology and administrative criteria for establishing indoor location accuracy test beds in six different markets across the country for evaluating solution vendors’ indoor location technologies.

Verizon also explained the wireless industry’s ideas for a 911 location system that will deliver dispatchable location information to PSAPs for wireless callers. We explained that dispatchable address solutions should be the principal focus of industry and public safety, and the Commission should be encouraging their development and deployment. Verizon described the opportunities for wireless service providers to leverage the broad ecosystem of indoor access points, such as small cells, Distributed Antenna Systems (DAS), and Wi-Fi and beacon systems, and other residential customer premises equipment. Verizon also explained that unlike solutions that provide a vertical location estimate – which requires geocoding or other data processing capability at the PSAP premises beyond what is available for horizontal x/y coordinates – dispatchable location will be compatible with PSAPs’ existing systems.

Finally, we briefly discussed the critical need to ensure that there is a robust and competitive marketplace for location solutions. This means that the Commission cannot adopt rules that inextricably tie regulatory compliance to a single source vendor. Using test bed evaluations, the Commission must ensure that two or more vendors can demonstrate that any proposed regulatory standards can be met and that E911 location solutions will perform as advertised.

As the attached document shows, this predicate has not yet been met. This document assesses the rulemaking record to date and confirms that vendors' E911 location solutions are not yet capable of meeting the Commission's proposed indoor accuracy standards, timetables and geographic coverage requirements.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

A handwritten signature in cursive script that reads "Neeka Chazor".