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January 5, 2015

## VIA ELECTRONIC FILING

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street SW  
Washington DC 20554

**Re:** Written Ex Parte Presentation  
*Wireless E911 Location Accuracy Requirements – PS Docket No. 07-114*

Dear Ms. Dortch:

On January 31, 2014, representatives of AT&T Services, Inc. met with the FCC's Public Safety and Homeland Security Bureau regarding AT&T Mobility's plans to transition from the FCC's network-based 911 location accuracy requirements to their handset-based 911 location accuracy requirements.<sup>1</sup> While the Commission's rules clearly anticipate carriers undertaking such a transition, they do not specify precise details regarding how such a transition would take place, specifically with respect to the staggered milestones between the handset-based requirements and the network-based requirements. During this meeting, we informed the Bureau of our intentions to use the date of the 5-year *network*-based benchmark (January 2016) as the first opportunity to comply with the 2-year *handset*-based benchmark (which occurred in January 2013), rather than wait 4 years until the next official compliance benchmark (the 8-year benchmark in January 2018) established in the Commission's rules.

Consistent with our discussions in that meeting, because AT&T Mobility has completed the effort (one-year early) to meet the handset-based accuracy requirements for January 2016, we are withdrawing all previous Phase II network-based County Level Exclusion lists filed by AT&T.<sup>2</sup>

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<sup>1</sup> The ex-parte notice regarding that meeting is available here: <http://apps.fcc.gov/ecfs/document/view?id=7521069889>

<sup>2</sup> The most recent Phase II County Level Exclusion List filed by AT&T is available here:  
<http://apps.fcc.gov/ecfs/document/view?id=7022101235>  
<http://apps.fcc.gov/ecfs/document/view?id=7022101236>



Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket. Please do not hesitate to call me if you have questions.

Sincerely,

/s/ Joseph P. Marx  
Assistant Vice President, AT&T Services Inc.

cc: (via email)

David Simpson  
David Furth  
David Siehl

Trey Forgety, National Emergency Number Association  
Stephen J. Wisely, Association of Public-Safety Communications Officials International  
Harriet Miller-Brown, National Association of State 9-1-1 Administrators



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Proceeding

Name	Subject
07-114	In the Matter of revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems.

### Contact Info

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Details

**exparte:** YES

**Type of Filing:** NOTICE OF EXPARTE

Document(s)

File Name	Custom Description	Size
E911 Location Accuracy Ex Parte DC OUC final.pdf		412 KB

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