



**Competitive Carriers Association**  
Rural • Regional • Nationwide®

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January 16, 2015

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: NOTICE OF EX PARTE**

**PS Docket No. 07-114:** *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*

Ms. Dortch:

The *Roadmap for Improving E911 Location Accuracy* recently submitted by APCO, NENA, AT&T, Sprint, T-Mobile and Verizon Wireless (the “Roadmap”)<sup>1</sup> is a well-balanced proposal aimed at improving enhanced location accuracy standards for both outdoor and indoor calls to 911, while also establishing benchmarks for providing a “dispatchable location” to first responders. For this reason, CCA supports, exclusively for the four nationwide carriers, adoption of the Roadmap. However, CCA has concerns regarding the testing, reporting and deployment arrangements agreed to by the largest providers in the Roadmap as applied to smaller carriers.<sup>2</sup> Accordingly, CCA submits the attached *Parallel Path for Competitive Carriers' Improvement of E911 Location Accuracy Standards* for the Commission's consideration in this proceeding (the “Parallel Path”). The Parallel Path follows the same structure as the Roadmap but affords minor modifications to those carriers who have not entered into that agreement. The primary differences between the Roadmap and the Parallel Path are highlighted below.

First, while CCA supports the idea of a technology neutral test bed to evaluate possible location solutions including those described in this docket, a vast majority of CCA carrier members do not hold spectrum licenses or other authorizations in markets where the test bed will be established. The Parallel Path fosters opportunities for non-nationwide carriers to nonetheless take advantage of the test bed process.

The Roadmap also acknowledges that “implementation and execution of the elements within [the Roadmap] may be subject to a number of variables, including but not limited to standards development and third party resources, which may require the signatories to reassess the progress of” the agreement. But non-nationwide carriers are not on the same LTE (much less VoLTE) deployment

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<sup>1</sup> See *Ex Parte* Letter from John Wright, President, APCO International *et al.* to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket No. 07-114 (filed Nov. 18, 2014), Attachment A, *Roadmap for Improving E911 Location Accuracy* (“Roadmap”).

<sup>2</sup> See Comments of Competitive Carriers Association, PS Docket No. 07-114 (filed Dec. 15, 2014).

schedules as the nationwide carriers,<sup>3</sup> and smaller providers also have trouble getting access to cutting edge devices that include advanced features, such as the A-GNSS capability contemplated by the Roadmap.<sup>4</sup> Subscribers in rural areas, who have fewer choices in available devices as compared to subscribers in metro areas,<sup>5</sup> are less prone to upgrade their devices—compounding this problem. Like access to spectrum, the Commission must take these challenges into account when implementing future requirements for enhanced location accuracy information. The Parallel Path takes these challenges into account by affording non-nationwide carriers additional time to meet certain performance benchmarks, such as tying implementation of VoLTE-based solutions to the time when these carriers have an operational VoLTE network. The Parallel Path also exempts certain non-nationwide carriers who operate in very sparsely populated areas from vertical location information milestones set out in the Roadmap, as delivery of this information is more valuable in densely populated urban areas. Finally, the Parallel Path ensures that competitive carriers will be allowed to participate in any decisions made through standards bodies or working groups that are necessary to carry out the efforts undertaken by the Roadmap and the Parallel Path.

The attached Parallel Path is offered in an effort to increase the accuracy of location information for wireless 911 calls delivered by competitive carriers that are not a part of the Roadmap and who need for additional time to achieve the same enhanced location accuracy performance milestones vis-à-vis their national counterparts. CCA has consulted with APCO and NENA on the proposals set forth herein and has incorporated changes to the Parallel Path based on these organizations' feedback.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please contact the undersigned with any questions or concerns.

Sincerely,

*/s/ Rebecca Murphy Thompson*

Rebecca Murphy Thompson  
General Counsel

cc (via email): Daniel Alvarez (FCC)  
Brendan Carr (FCC)  
David Furth (FCC)  
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<sup>3</sup> *Id.* at 4-5.

<sup>4</sup> *Id.* at 5.

<sup>5</sup> *See* Press Release, Current Analysis, Rural Wireless Customers are High Value Subscribers, Reveals Current Analysis Survey Commissioned by CCA (Sept. 16, 2013), *available at* <http://www.currentanalysis.com/news/2013/pr-rural-wireless-subscribers.asp> (noting that “close to 40 percent of rural wireless consumers feel they have less choice when it comes to devices and service plans as compared to subscribers in metro areas.”).