



January 22, 2015

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: Ex Parte Presentation
GN Docket No. 07-114**

Dear Ms. Dortch:

Polaris Wireless, Inc. ("Polaris") respectfully submits this letter in the above-referenced proceeding regarding wireless E911 location accuracy requirements.

We agree with the Commission that evaluating both indoor and outdoor location accuracy performance individually is vital to the interests of public safety and wireless emergency response. This is why open, public test-bed demonstration of wireless location technologies is so critical – evaluating candidate solutions enables the Commission to ensure that its public safety objectives are met. For example, demonstration in regional test-beds led by ATIS, which was recommended by CSRIC and firmly endorsed by the Commission, allows prediction of indoor location accuracy performance throughout the U.S. across numerous morphologies and environments.

Some misrepresent the Commission's intent in order to further their own agendas. For example, the Commission clearly does not intend for its rulemaking to exclude multi-sensor "hybrid solutions ... that rely on GPS."¹ Rather, its rulemaking will ensure that technologies which are used to locate emergency wireless calls will, in fact, perform well indoors. Polaris was one of three wireless location technology providers that participated in the CSRIC pilot phase of 2G indoor location accuracy tests, and we are fully committed to participating in the next round of multi-region CSRIC indoor tests and demonstrating our 3G and 4G wireless location technologies.

In addition, we were surprised to learn that the four national wireless carriers wish to further restrict indoor location solutions to just a fraction of their networks.² We anticipate that residents of Austin, TX, Jacksonville, FL, Richmond, VA, Orlando, FL, Syracuse, NY, Tacoma, WA, and Mobile, AL – not to mention the residents of more than two-thirds of the U.S. state capitols – would be disappointed to hear that their Cellular Market Areas ("CMAs") did not make the list of the top-50 most-populous CMAs which would receive improved emergency location services under the Carrier Roadmap (as amended).

Polaris appreciates the opportunity to submit its comments in this important proceeding. In our meetings with Admiral Simpson and staff of the Public Safety & Homeland Security Bureau, we have

¹ See Letter to Marlene H. Dortch from Joan Marsh, AT&T Services, Inc.; Ray Rothermel, Sprint; Kathleen O'Brien Ham, T-Mobile USA; and Kathleen Grillo, Verizon at 2 (January 21, 2015).

² *Id.* at 3.

found the FCC's process to be inclusive and respectful of input from all stakeholders. If there is any additional information that we can provide to assist the Commission, we invite the Commission to contact us directly.

Respectfully submitted,

POLARIS WIRELESS, INC.

By: /s/ David De Lorenzo

David S. De Lorenzo, PhD
Principal Research Engineer
Polaris Wireless, Inc.
301 North Whisman Road
Mountain View, CA 94043