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January 30, 2015

**Via electronic mail**

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

Re: Ex Parte Presentation WC Docket Nos. 14-174 and 05-196; GN Docket Nos. 11-117 and 13-5; and PS Docket Nos. 11-153 and 10-255

Dear Ms. Dortch:

On January 28, 2015, Maurice B. Tosé, CEO and Founder, and Tim Lorello, Senior Vice President, both of TeleCommunication Systems, Inc. ("TCS"); and Shannon Scott-Paul of O'Brien Gentry & Scott LLC in person, met with RADM David Simpson, Chief of the Public Safety and Homeland Security Bureau; and David Furth, Deputy Chief, in person as well as with Erika Olsen, by telephone; all three being with the Public Safety and Homeland Security Bureau ("PSHSB") of the Federal Communications Commission ("FCC" or "Commission"). In addition, the undersigned, though not present, was involved in preparing the meeting materials.

TCS' representatives discussed an open TCS petition which asks the FCC to provide interpretative guidance that the provision of 9-1-1 services is "by or for the benefit of the US government" and suggested that this declaration could provide the foundation for needed patent reform in light of the current technology transition occurring in the public safety market. TCS highlighted the deleterious effect of costly and frivolous patent litigation on needed Research and Development (R&D) for public safety and presented the following perspectives:

- There are long-term and significant R&D costs to support public safety initiatives
- Patent litigation in today's litigious environment is costly, is projected to be burdensome to 9-1-1 providers, and does little more than reduce potential R&D investment in public safety
- Technology transition expands the potential patent exposure to 9-1-1 providers because of the significant number of "internet" patents compared to the relatively limited number of current telecommunications and location-based patents
- FCC intervention is necessary, straightforward and appropriate

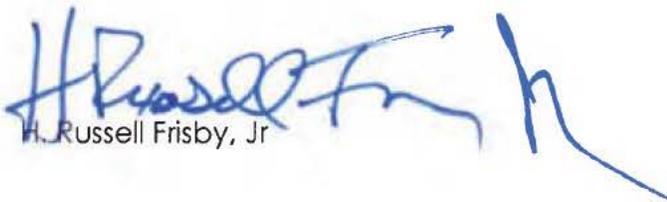
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The discussion particularly focused upon FCC authority to oversee public safety, especially with respect to the provision of 9-1-1 services. It was submitted that Commission guidance is both appropriate and necessary in this case in light of the FCC's fundamental mission to promote the "safety of life and property through the use of wire and radio communications" which as the Commission has acknowledged gives it broad statutory authority with relation to ensuring reliable 911 service and capabilities related thereto.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter and a copy of materials presented during this meeting are being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please direct any questions to the undersigned.

Sincerely,

Stinson Leonard Street LLP



H. Russell Frisby, Jr

HF:SLS

Enclosure

cc: David Simpson  
David Furth  
Erika Olsen