



Prima Research LLC

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USA

15 July 2015

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

Re: Wireless E9-1-1 Location Accuracy Requirements, PS Docket No. 07-114

Dear Ms. Dortch:

Prima Research LLC ("Prima") is submitting the attached white paper, Mobile Wireless Terminal Location in a Defined Local Space, as part of the record in the proceeding referenced above. The Prima white paper evaluates typical technical approaches to locating mobile wireless terminals, and introduces a new method that enables accurate location in three-dimensional space.

Prima has developed patented technology that can locate in real time, with accuracy and very high precision, any digitally modulated radio-frequency-emitting device within a three-dimensional defined local space (DLS). A DLS can be an indoor or outdoor space, or even a hybrid of the two. Shopping Malls, large retail stores, airports, sports arenas, train and bus stations, college and corporate campuses, commercial and residential high-rise buildings, and virtually any space designed specifically for gathering, are examples of a DLS.

Prima understands that industry working groups are now examining technology and methods with the goal of enabling accurate location of E911 callers in indoor spaces. In particular, the "Z-Axis" Working Group seems an appropriate body to consider the Prima method summarized in the attached White paper.

More information is available on our website: www.primaresearch.com, and I may be reached directly on 720.404.4507.

Respectfully submitted,

A handwritten signature in black ink that reads "Sharon L. Stasko". The signature is written in a cursive style.

Sharon L. Stasko
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Attachment

www.primaresearch.com

The first step in precision location services