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December 3, 2015

VIA ELECTRONIC DELIVERY

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

Re: Notice of Ex Parte Presentation
PS Docket No. 07-114

Dear Ms. Dortch:

On December 1, 2015, representatives of Polaris Wireless, Inc. ("Polaris") met with the Public Safety & Homeland Security Bureau ("PSHSB") of the Federal Communications Commission ("Commission") to discuss Polaris's E911 location accuracy solutions, and industry's efforts to meet the milestones adopted by the Commission in its *Fourth Report and Order* adopted in the above-referenced proceeding.[1] Attending the meeting on behalf of Polaris were: David De Lorenzo, PhD, Principal Research Engineer; Tarun K. Bhattacharya, Vice President Research; Karl Kessenich, Executive Director of Business Development; and Michele Farquhar and C. Sean Spivey, outside counsel to Polaris. Attending the meeting on behalf of the PSHSB were: Rear Admiral (ret.) David Simpson, Chief; David Furth, Deputy Chief; Michael Connelly; Tim May; Austin Randazzo; Rasoul Safavian; David Siehl; and Dana Zelman.

During the meeting, Polaris discussed how it, and the mobile location industry more broadly, continue to make improvements in location accuracy technology solutions. Polaris explained to the PSHSB how it has deployed its position-domain hybrid solution, which utilizes cellular and assisted Global Positioning System ("A-GPS"), on 2G and 3G networks domestically, and on 2G, 3G and 4G networks internationally. Further, Polaris will launch its measurement-domain and position-domain hybrid solution, which utilizes cellular, augmented global navigation satellite system ("A-GNSS"), Observed Time Difference of Arrival ("OTDOA") and other technologies, with a U.S. Tier-1 CMRS provider in the first quarter of 2016. Polaris also has commercialized its accurate vertical height "z-axis" solution for public safety applications, and successfully completed live trials with federal, state and local law enforcement agencies and international security organizations.

Polaris and its domestic E911 customers are eager to demonstrate that its current E911 solutions are capable of meeting the initial performance benchmarks set out in the *Fourth Report and Order*, and Polaris continues to engage with relevant industry groups on opportunities to participate in the independent test bed being constructed by stakeholders. Polaris shared with the

[1] *In the Matter of Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Fourth Report and Order, 30 FCC Rcd 1259 (2015) ("*Fourth Report and Order*").

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PSHSB its challenges in working with test bed stakeholders to date in order to find an appropriate fit in the test bed for evaluating its E911 location platform. Specifically, because the proposed objective of the first phase of the test bed is for nationwide carriers to demonstrate their compliance with the interim benchmarks, and because Polaris does not currently serve any of the four nationwide providers (and is not deployed in either of the two test bed sites), Polaris has not been afforded an opportunity to participate in the first phase of the test bed. Despite this, Polaris is optimistic that it will be allowed to participate in the second phase of testing designed for next generation technologies, even though the Polaris solution is not new to the industry.

The PSHSB and Polaris therefore discussed how Polaris (and the non-nationwide carriers it serves) can best demonstrate compliance with the interim benchmarks utilizing the technology solution which Polaris has deployed in the market today. Specifically, the PSHSB suggested that Polaris might consider implementation of parallel testing mechanisms for evaluating and certifying Polaris's E911 location solution. Similar to the consideration given in the *Fourth Report and Order* to rural and regional carriers that do not provide service in the location(s) of the test bed, vendors that do not plan to provide service to any carrier in the test bed location(s) need an alternative means of validating their currently deployed solutions. Based on this discussion, Polaris understands that the *Fourth Report and Order* allows alternative testing outside of the industry-led test bed process, so long as the evaluation mechanisms and key performance indicators are substantially similar to those of the industry test bed, the testing itself is performed independently, and the carrier certifies that it has deployed the technology throughout its network in the same manner as tested.[2]

The presentation slides discussed at the meeting are attached.

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing this letter electronically in the above-referenced docket. Please contact me directly with any questions.

Respectfully submitted,

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Enclosures

cc (via email):

Rear Admiral (ret.) David Simpson
David Furth
Michael Connelly
Tim May
Austin Randazzo
Rasoul Safavian
David Siehl
Dana Zelman

[2] *See Fourth Report and Order*, 30 FCC Rcd at 1308, ¶ 130.