



December 22, 2015

Via ECFS

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

Re: Wireless E-911 Location Accuracy Requirements (PS Dkt. 07-114)

Dear Ms. Dortch:

On December 21, 2015, Matthew Gerst and Brian Josef of CTIA<sup>®</sup> spoke via teleconference with David Furth, David Siehl, Dana Zelman, and Austin Randazzo of the Public Safety & Homeland Security Bureau regarding wireless carrier compliance with the Commission's *Wireless E911 Location Accuracy Fourth Report & Order*, and use of the independent Test Bed. In particular, CTIA responded to a recent ex parte presentation by Polaris Wireless, Inc. regarding compliance testing for non-nationwide carrier-deployed location technologies.<sup>1</sup>

By way of background, the *Fourth Report & Order* directed wireless carriers to establish an independently administered and transparent Test Bed to test and verify that location technologies are capable of meeting the Commission's new indoor location accuracy requirements.<sup>2</sup> CTIA established the 9-1-1 Location Technologies Test Bed, LLC ("Test Bed LLC") as an independent company for such purposes and the Alliance for Telecommunications Industry Solutions ("ATIS") was selected as the Test Bed program manager. The Test Bed is modeled on the Commission's CSRIC III and IV methodologies and recommendations and is established consistent with the Commission's *Fourth Report & Order*.<sup>3</sup>

In our discussion with the Commission, we described how the Test Bed LLC will also implement the Test Bed consistent with the recommendations of ATIS's

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<sup>1</sup> Polaris Wireless, Inc. Ex Parte Letter (filed December 4, 2015) ("Polaris ex parte").

<sup>2</sup> *Wireless E911 Location Accuracy Requirements*, 30 FCC Rcd 1259 at paras. 121-132 (2015) ("Fourth Report & Order").

<sup>3</sup> *Id.*



Emergency Service Interconnection Forum (“ESIF”) Emergency Services & Methodologies (“ESM”) Subcommittee which has developed a test plan through a collaborative multi-stakeholder process. Specifically relevant to the *Polaris ex parte*, ATIS ESIF ESM has recommended a multi-stage test process to facilitate wireless carrier and location technology vendor participation in the Test Bed.<sup>4</sup> A summary of ATIS ESIF ESM’s recommended test plan stages follows:

1. Stage 1 of the Test Bed will involve indoor testing of nationwide wireless carriers’ deployed horizontal location technologies in Atlanta and San Francisco. The test results will be used to support carrier compliance reporting for the interim benchmarks. Non-nationwide carriers with currently deployed technologies may participate in the Test Bed if such technologies are deployed in Atlanta and/or San Francisco. According to the *Fourth Report & Order*, the Test Bed administrator must also provide non-nationwide carriers with the same data made available to the participating nationwide carriers.<sup>5</sup>
2. Stage 2 will involve location technology vendor testing of near-term emerging horizontal and vertical location technologies that are not currently deployed by the nationwide wireless carriers. Stage 2 testing will also occur in Atlanta and San Francisco.
3. Beyond Stage 2, there will be additional rounds of testing as needed, by location technology vendors or carriers.

Polaris explains in the recent *ex parte* that its 9-1-1 location technology is not currently deployed by any of the nationwide carriers, but it is deployed by some non-nationwide carriers. Test result data from the nationwide carriers’ technologies thus are not relevant for Polaris’ non-nationwide carrier customers. Polaris’ non-nationwide carrier customers also do not offer service in Atlanta or San Francisco. The Stage 1 testing, therefore, does not afford an opportunity for those non-nationwide carriers that deploy Polaris technology to assess compliance with the interim benchmarks as contemplated by the Commission’s *Fourth Report & Order*.

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<sup>4</sup> ATIS ESIF ESM, *Wireless Location Technologies Indoor Test Bed Plan (2016 and beyond)*, available at [http://www.atis.org/esif/Docs/TestBed\\_Stages.pdf](http://www.atis.org/esif/Docs/TestBed_Stages.pdf) (last visited Dec. 16, 2015)

<sup>5</sup> *Fourth Report & Order*, 30 FCC Rcd at para. 132.



Under the circumstances described here, CTIA agrees with Polaris and the Commission that it is appropriate for Polaris' non-nationwide carrier customers to engage in testing in parallel with the Test Bed in order to evaluate whether the Polaris-deployed technology complies with the interim benchmarks. That is, if a non-nationwide carrier's currently deployed 9-1-1 location technology solution is different from the solutions deployed by nationwide carriers, and if that non-nationwide carrier does not provide service in Atlanta or San Francisco, then a non-nationwide carrier may engage an independent body to test compliance with the interim benchmark. This testing should involve the same independently administered and transparent test methodology that ATIS ESIF ESM has recommended and the Test Bed LLC will utilize to operate the Test Bed.

Beyond the unique circumstances described in the *Polaris ex parte*, we clarified with the Commission that the *Fourth Report and Order* does not contemplate alternative testing outside of the Test Bed established by the wireless carriers. In Stage 2 of the Test Bed, location technology vendors will have an opportunity to participate in the independently administered and transparent Test Bed to test near-term emerging horizontal and vertical location technologies that are not currently deployed. We further emphasized that location technology vendor participation in the Test Bed is necessary to ensure that competing location technologies are evaluated consistently and objectively, especially if carriers are going to consider such technologies for compliance with the Commission's benchmarks.

This letter is submitted consistent with the Commission's ex parte rules.

Sincerely,

*/s/ Matthew Gerst*

Matthew Gerst  
Director, Regulatory Affairs  
CTIA®

cc (via e-mail): David Furth  
David Siehl  
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