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September 26, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA COURIER

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **NOTICE OF EX PARTE MEETING**
CC Docket No. 94-102/
RM-8143
Compatibility with Enhanced 911 Emergency Calling Systems

Dear Ms. Salas:

On September 25, 2001, George Marble, Vice President, Marketing, Grayson Wireless Division ("Grayson") of Allen Telecom, Inc. ("Allen") and I had an *ex parte* meeting with Peter A. Tenhula, Senior Legal Advisor to Chairman Michael K. Powell, regarding the above-referenced docket.

We discussed Grayson's Geometrix® network-based wireless 911 location system, and the fact that the system now is compatible with wireless handsets that use the GSM air interface. Geometrix® now can provide E911 Phase II location capability for all cellular and PCS handsets using any wireless air interface, or any combination of interfaces, in use in the United States, including CDMA, GSM, AMPS, TDMA, and iDEN. The GSM capability can be implemented in new Geometrix® systems or by means of a software download into existing Geometrix® equipment now in production. Grayson designed Geometrix® to meet the current Phase II requirements for accuracy, and the system has been made available in a timeframe consistent with the October 1, 2001 implementation standard. Grayson began producing commercial-grade Geometrix equipment last December, and is prepared to manufacture and install Geometrix® location systems in sufficient quantities to meet significant carrier demand.

We also discussed test results of the Geometrix® system for the various air interfaces. Enclosed is a copy of the presentation materials from Grayson that were handed out at the meeting. The last page provides a summary of test results from the Geometrix® testing system in Fairfax County, Virginia, and demonstrates that the accuracy of Geometrix® for call locations for each air interface were compliant with the FCC E911 Phase II requirements. We also discussed the extensive carrier field-testing of Geometrix® to date and the information

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assembled from this real-world experience. We discussed that no two wireless topologies or geographic morphologies are identical, and it is reasonable to expect inter- and intra-system performance variations in commercial deployments of Geometrix®, just as is experienced in the performance of wireless networks themselves. Nevertheless, testing results conclude that the overall performance of Geometrix® systems can be expected to be compliant with FCC E911 Phase II requirements and measurement guidelines. It is noteworthy that the latest software upgrades to Geometrix® for CDMA show additional improvement over already compliant accuracy results, indicating that Grayson continues to enhance Geometrix® performance via refinements in its processing algorithms. Allen Telecom continues to develop new software to improve accuracy, and software upgrades can be remotely downloaded into equipment that is already installed.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Eliot J. Greenwald', written in a cursive style.

Eliot J. Greenwald

cc: Peter A. Tenhula
George Marble

Federal Communications Commission

**Grayson Wireless
Wireless Location System**

UPDATE

**September 25,
2001**



Geometrix[®]
Wireless Location System



Geometrix[®] Wireless Location System GSM Update

- **GSM Compatibility Developed, Tested, Ready for Ordering**
 - Meets Phase II Accuracy Requirements
 - Accommodates Frequency Hopping and Encryption
 - Available In New Geometrix Systems and As Software Update

- **Geometrix Now Supports All Cellular & PCS Handsets (CDMA, GSM, AMPS, TDMA, iDEN)**

- **Geometrix Available for Deployment**
 - Production Began 4Q00 in Grayson's Virginia Plant
 - Currently Being Installed for Verizon Wireless in Chicago and St. Louis Areas



Sample Test Results

- All Air Interfaces (CDMA, GSM, TDMA, AMPS, iDEN)
- Results of Carrier Testing and Demonstrations
- Geometrix® Equipment Deployed at Commercial Wireless Sites
- Used Simplest, Most Economical Version of Geometrix (TDOA, Existing Antennas)
- Varied Test Call Scenarios
 - Stationary and In-Motion Calls
 - Outside (Ground-Level, Elevated, Below Grade, Autos, Highway, Streets, etc.)
 - Inside (Autos, Offices, Hotel Rooms & Lobby, Restaurants, Parking Garage, etc.)
- Commercial Handsets
- Accuracy Reference Established With Differential GPS
- Accuracy Compliant With FCC Requirements

Fairfax County Network Example Map



Fairfax County Network Example Results

AMPS	85	231	CTIA Wireless 2000 Live Demo (2/2000).
IS-136 (TDMA)	89	269	CTIA Wireless 2000 Live Demo (2/2000). Recent testing (9/2001).
IS-95 (CDMA)	83	215	CTIA Wireless 2000 Live Demo (2/2000). Verizon CDG Test (9/2000). Qwest CDG Mini-Trial (4/2001).
	34	62	Latest Software Update Testing (9/2001).
IDEN	87	206	Southern LINC Demonstration (9/2000).
GSM	74	124	Recent Testing (9/2001).