

EX PARTE OR LATE FILED

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR
3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7645
WWW.SWIDLAW.COM

ELIOT J. GREENWALD
DIRECT DIAL (202) 424-7809
EJGREENWALD@SWIDLAW.COM

NEW YORK OFFICE
THE CHRYSLER BUILDING
405 LEXINGTON AVENUE
NEW YORK, NY 10174
(212) 973-0111 FAX (212) 891-9598

October 25, 2001

VIA HAND DELIVERY

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

RECEIVED ORIGINAL
OCT 25 2001
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Dear Ms. Salas:

On October 24, 2001, George Marble, Vice President, Marketing, Grayson Wireless Division ("Grayson") of Allen Telecom, Inc. ("Allen") and I had an *ex parte* meeting with representatives of the Wireless Telecommunications Bureau ("Bureau") regarding the above-referenced docket. Representing the Bureau were James D. Schlichting, Thomas J. Navin, Daniel F. Grosh and Martin D. Liebman. In addition, we had a brief discussion with William D. Lane prior to the meeting.

In accordance with FCC requests, we provided a status update regarding the deployment of Grayson's Geometrix® network-based wireless 911 location system. A copy of the materials that were used during the discussion is enclosed herewith. A Geometrix® system has been installed and tested, and as of October 22, 2001, has been in service in St. Clair County, Illinois. This is the first E911 Phase II caller location system in service in the United States. Geometrix® system equipment was installed at existing cell sites and connected to existing cell site antennas. Pre-service system testing yielded overall accuracy within 53 meters at the 67th percentile and 132 meters at the 95th percentile, well within the FCC E911 Phase II accuracy requirements for a network-based caller location solution. As can be seen in the enclosure, the system tests demonstrated Phase II-compliant accuracy in suburban, rural and highway environments. (There are no urban areas in St. Clair County. The "PSAP Selected" results are for particular locations selected by the PSAP for testing.)

A Geometrix® system has also been installed and tested in Lake County, Indiana. It is scheduled to begin providing locations on 911 calls to the Lake County PSAP service on or about November 5, 2001. Pre-service testing demonstrated overall accuracy within 49 meters at

the 67th percentile and 103 meters at the 95th percentile. The system tests yielded Phase II-compliant results in urban, suburban, rural and highway environments.

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
Bryan Tramont
Monica Shah Desai
Paul Margie
Thomas Sugrue
James D. Schlichting
Kris A. Monteith
Thomas J. Navin
William D. Lane
Daniel F. Grosh
Martin D. Liebman
Patrick Forster
Jennifer B. Tomchin
Gregory Vadas
George Marble

Federal Communications Commission

Wireless Telecommunications Bureau

Grayson Wireless

October 24, 2005

Phase II System In Service

Counties: St. Clair County, IL

Counties: Lake County, IN



Geometrix[®]
Wireless Location System

Wireless E911 Location - St. Clair, IL PSAP



Map Labels: COUNTRY CLUB PL, JENNIFER, N 82ND ST, N 81ST ST, N 80TH ST, N 79TH ST, N 78TH ST, N 77TH ST, N 76TH ST, N 75TH ST, N 74TH ST, N 73TH ST, N 72TH ST, N 71TH ST, N 70TH ST, N 69TH ST, N 68TH ST, N 67TH ST, N 66TH ST, N 65TH ST, N 64TH ST, N 63TH ST, N 62TH ST, N 61TH ST, N 60TH ST, N 59TH ST, N 58TH ST, N 57TH ST, N 56TH ST, N 55TH ST, N 54TH ST, N 53TH ST, N 52TH ST, N 51ST ST, N 50TH ST, N 49TH ST, N 48TH ST, N 47TH ST, N 46TH ST, N 45TH ST, N 44TH ST, N 43TH ST, N 42ND ST, N 41ST ST, N 40TH ST, N 39TH ST, N 38TH ST, N 37TH ST, N 36TH ST, N 35TH ST, N 34TH ST, N 33TH ST, N 32ND ST, N 31ST ST, N 30TH ST, N 29TH ST, N 28TH ST, N 27TH ST, N 26TH ST, N 25TH ST, N 24TH ST, N 23TH ST, N 22ND ST, N 21ST ST, N 20TH ST, N 19TH ST, N 18TH ST, N 17TH ST, N 16TH ST, N 15TH ST, N 14TH ST, N 13TH ST, N 12TH ST, N 11TH ST, N 10TH ST, N 9TH ST, N 8TH ST, N 7TH ST, N 6TH ST, N 5TH ST, N 4TH ST, N 3TH ST, N 2ND ST, N 1ST ST, N 0TH ST.

Call Information			
ANI (618) 511-0425	Circle CELADT	Talk Status Hung up:	Emergency Calls Waiting <input type="checkbox"/>
ESN 0075	ACD Type RingAll	Emergency Calls on Hold <input type="checkbox"/>	Admin Calls Waiting <input type="checkbox"/>
Request All	Release Call	Request All	Request All
0/17 17:40			
(618) 511-0425 WPH2			
VERIZON WIRELESS PHASE 2 TEST			
8009 Ruck Rd - 3WSW			
BELLEVILLE			
CALLBK=(314)791-4740			
CENCOM			
IL P# (618)511-0425			
WIRELESS: ST CLAIR CO-CENCOM			
REQUEST CALLER LOCATION			
VERIFY CALLER'S N			
ESN 0075 CO=VZW POS # 16			
+38.563878 - 90.051047			

6 mi	1735 N 65TH ST	ESN 102	X: -90.06248 Y: 38.56389	DMS X: -90.03109 DMS Y: 38.3336
------	----------------	---------	--------------------------	---------------------------------

ScnTinel 911 - OPR 1 [C:\Program Files\ACML Technologies\MINIExp1.ctg]

Control Edit View Tools Actions Help

Volume	Privacy	Hold	Join	Flash	Ringback	Release	Speed Dial	Keypad	TDD	Prev Calls						
CAROX	CASYVL	CENCOM	CENTVL	ESTL	FAIRVW	OPALON	SCOTT	SWANS	ST POL	COLUMB	COLUMB					
MoPds	MoFds	MoEMS					FAX	MISC	911OFF	SCHOOL	BandCo	CI NTN	MAD911	ManCo	Rudolt	WshCo

PSAPS

Ready Connected with CELADT

Start Geolynx ScnTinel 911 - OPR ... 6:36 PM



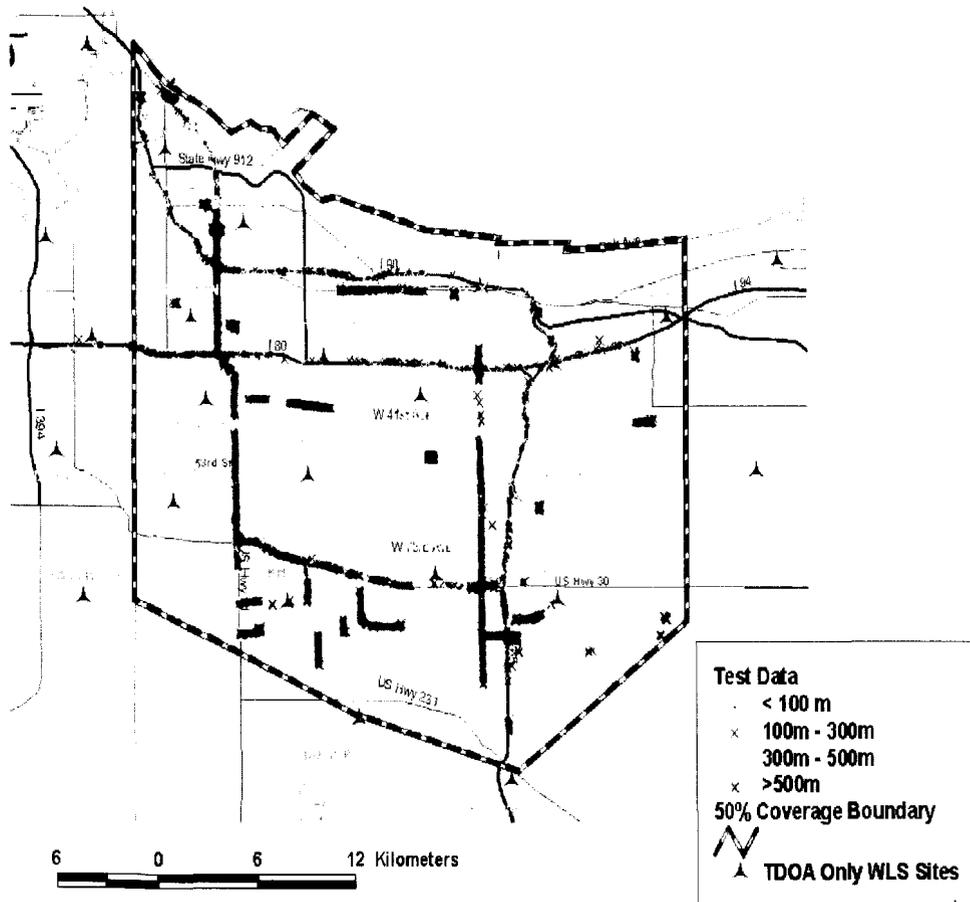
Geometrix® Wireless Location System

St. Clair County, Illinois

Pre-Service Accuracy Testing

Environment	67 th Percentile Statistic	95 th Percentile Statistic	Locations
Urban	Not Applicable	Not Applicable	Not Applicable
Suburban	56.9 m	186.9 m	1320
Rural	55.1 m	98.6 m	1317
Highway	44.6 m	101.9 m	633
PSAP Selected	53.6 m	131.6 m	333
All Environments (3,600 Fixes)	67th Percentile 53.2 m	95th Percentile 132.3 m	

Geometrix® Wireless Location System Lake County, Indiana



- Second E911 Phase II Service in U.S.
- November 5, 2001 (scheduled)
- CDMA and AMPS
- Lake County PSAP
- 31 Cell Sites Equipped With Geometrix® Network-Based Location System
- Existing Cell Site Antennas



Geometrix[®] Wireless Location System

Lake County, Indiana

Pre-Service Accuracy Testing

Environment	67 th Percentile Statistic	95 th Percentile Statistic	Locations
Urban	59.4 m	122.8 m	1143
Suburban	46.6 m	98.6 m	1114
Rural	46.5 m	91.0 m	1691
Highway	50.0 m	111.6 m	1625
PSAP Selected	Not Applicable	Not Applicable	Not Applicable
All Environments (5,500 Fixes)		67th Percentile 48.7 m	95th Percentile 102.5 m



Geometrix® Wireless Location System Initial Service Implementations

First E911 Phase II Compliant System in Service

- In-Service October 23 in St. Clair County, IL
- Next Service November 5 in Lake County, IN
- Systems Installed, Prepared and Tested in Less Than 60 Days
- Both Systems Substantially Bettered FCC Phase II Accuracy Requirements in ALL Environments
 - Within **51 Meters** on **67%** of Locations
 - Within **117 Meters** on **95%** of Locations
 - Testing Followed CDG Test Plan (160 Scenarios; 9,100 Test Fixes)