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BY ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Oral Ex Parte Presentation
Docket No. 94-102

Dear Ms. Dortch:

On behalf of my client QUALCOMM Incorporated ("QUALCOMM"), this is to report that Jonas Neihardt of QUALCOMM and I met yesterday with Bryan Tramont and Amanda Walker of the Office of Chairman Powell and Trey Hanbury of the Office of the General Counsel to discuss three matters relating to the above-referenced docket.

First, we provided an update of the progress made by QUALCOMM in manufacturing chips containing Assisted-GPS position location technology which have been incorporated into millions of wireless phones in compliance with the Commission's E911 mandate. We explained that there are now well over 10 million wireless phones in the United States containing Assisted-GPS E911 technology, and that we expect to see a continued proliferation of these phones.

Second, we discussed the waivers of the Commission's E911 accuracy rules that a number of rural carriers operating wireless systems using analog or TDMA technology have requested from the Commission. We pointed out that such carriers cannot show the lack of a reasonable alternative to a waiver, because such carriers can convert to the CDMA air interface and implement Assisted-GPS as their E911 solution, thereby complying with Commission's accuracy rules in light of the highly accurate and precise performance of Assisted-GPS. We noted a recent filing by one rural carrier which serves one RSA which has opted for this path to comply with the Commission's E911 rules, and stated that there is no reason why the other rural carriers seeking waivers of the accuracy rules could not adopt the same approach. Indeed, we explained that it would be grossly unfair and inequitable to those rural carriers who are bearing

the costs to convert to CDMA and implement Assisted-GPS for the Commission to allow other carriers to avoid similar costs by granting them a waiver.

We gave an overview of two initiatives by QUALCOMM to meet the needs of small rural carriers seeking to deploy Assisted GPS. The first is QUALCOMM's agreement with Telecommunications Systems, Inc. ("TCS") for establishment of a service-bureau style wireless location server platform that can be shared by multiple carriers using Assisted GPS for E911 service. This agreement enables a small carrier to deploy Assisted GPS without having to incur the cost of purchasing its own dedicated server. Likewise, Intrado Inc. ("Intrado") also offers a service-bureau type wireless location server platform that multiple carriers can use so that a small carrier need not purchase a dedicated server to deploy Assisted GPS. QUALCOMM's second initiative for small rural carriers is QUALCOMM's agreement with TechnoCom for the provision of system integration support for carriers deploying Assisted GPS. Under this agreement, TechnoCom is the preferred vendor for field-test, engineering, and integration services for Assisted GPS deployment. Small carriers can contract with TechnoCom for these services, rather than having to assemble and train an in-house team.

We also stated that the rural analog/TDMA carriers seeking a waiver of the Commission's E911 accuracy rules could comply with the rules by bearing the costs of implementing a compliant network solution. We urged that the Commission not allow these carriers to avoid the costs of E911 compliance through grant of a waiver merely because they have chosen to offer service via analog and/or TDMA, particularly because, ultimately, these carriers will have to convert from these air interfaces to either GSM or CDMA for reasons unrelated to the Commission's E911 rules.

Third, we emphasized the importance of the Commission enforcing its rules and the terms of prior waiver Orders and Consent Decrees with respect to carriers who have chosen to implement a network solution over the GSM air interface. We explained that to the extent that such carriers encounter technical issues in implementing a network solution which will substantially delay them from initiating Phase II service, these carriers, too, have reasonable alternatives. We stated that this month, QUALCOMM will begin sampling its MSM6250 chipset, which incorporates Assisted-GPS for both the GSM and WCDMA/UMTS air interfaces, and we expect that commercial handsets containing the MSM6250 should be available by the second half of next year. Moreover, we also said that we believe commercial handsets containing Assisted-GPS for the GSM air interface not using a QUALCOMM chip may be available in Europe before the end of this year. As a result, we asked that to the extent that there is any further delay by the GSM carriers in implementing Phase II service due to technical issues with a network solution, the Commission should require the carriers immediately to adopt and begin implementing a compliant solution, and that Assisted-GPS was such a compliant solution.

I am filing this letter with the Commission electronically via the ECFS system.

Respectfully submitted,

/s/ Dean R. Brenner

Dean R. Brenner
Attorney for QUALCOMM Incorporated

cc: Bryan Tramont (via email)
Amanda Walker (via email)
Trey Hanbury (via email)