

May 9, 2007

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911
Emergency Calling Systems, CC Docket No. 94-102

Dear Ms. Dortch:

On May 7, 2007, Michael Amarosa of TruePosition, Inc. and Philip L. Verveer and the undersigned of Willkie Farr & Gallagher LLP met with Derek Poarch, Chief of the Public Safety & Homeland Security Bureau, Dana Shaffer, Deputy Chief of the Public Safety & Homeland Security Bureau, and Tim Peterson, Chief of Staff of the Public Safety & Homeland Security Bureau.

Mr. Amarosa discussed TruePosition's history of providing location-based services for wireless networks. To that end, Mr. Amarosa provided Chief Poarch with copies of the documents in Attachment A. Further, Mr. Amarosa discussed various issues impacting the deployment of wireless E911, including, among other things, recent press reports that the Commission is considering taking action on wireless E911 issues, such as the October 6, 2004 Request for Declaratory Ruling filed by APCO International.¹ Mr. Amarosa reiterated TruePosition's support for a forum or summit of the various wireless E911 stakeholders, including wireless carriers, the public safety community, state and federal policymakers, and the technology companies that develop and deploy location-based services, to discuss the current state of wireless E911 deployment, including questions related to accuracy, cost-recovery, and other issues that are having an impact on the availability and quality of wireless E911. Mr. Amarosa noted the success of the Commission's recent summit for First Responders.

¹ APCO International, Request for Declaratory Ruling, Dkt. No. 94-102 (filed Oct. 6, 2004).

Ms. Marlene Dortch
May 9, 2007
Page 2

Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Daniel K. Alvarez
Daniel K. Alvarez
WILLKIE FARR & GALLAGHER LLP
Counsel for TruePosition, Inc.

cc: Chief Derek Poarch
Ms. Dana Shaffer
Mr. Tim Peterson

ATTACHMENT A



Wireless Location Solutions for Homeland Security

Guarding borders, ports, and airports. Helping to efficiently deploy response teams by tracking who has arrived and who needs more assistance. Quickly locating victims. Even helping to identify suspects before and after an attack.

In homeland security situations, location information can serve as an extremely valuable and cost-efficient way to protect and save lives. Wireless location technologies provide valuable intelligence information that can help prevent attacks, identify suspects, and help first responders act accordingly.

TruePosition — the established leader in wireless location technologies — provides the precision, consistency, and accuracy required for homeland security applications.

Homeland Security Applications that Utilize Location-Based Technologies include:

- **Port Management/Security:** Locate harbor vehicles, vessels, and containers. Manage ships and containers as they move in and out of U.S. ports.
- **Border Patrol:** Locate a suspect phone or RF device linked to any criminal activity.
- **Post Attack Search and Rescue:** Give first responders information that helps them improve their response time. Identify the position of victims who are using their wireless devices or any device that emits RF energy (perhaps trapped inside a building). Track, monitor, and manage response teams.
- **Transportation/Infrastructure Systems:** Protect and restrict access to bridges, tunnels, airports, and nuclear power and water plants. Track the position of hazardous materials or weapons as they enter and exit through tunnels (either through asset tracking or through the detection of a targeted phone or emergency radio).

Wireless Location Capabilities

TruePosition's solutions-based offering includes a variety of location applications that bring valuable intelligence information to homeland security:

- **Mobile Phone Location:** Locate the position of any phone.
- **Geofencing:** Create a virtual fence around a specific geographic location, send alert signals anytime a particular wireless device enters or exits the area, prevent the penetration of a restricted area.
- **Asset/People Tracking:** Monitor RFIDs or any device that emits RF on equipment, assets, and people. Identify the asset and its location, direction, and speed.

Location: Above and Beyond GPS

Today's best known location technology utilizes Global Positioning Systems (GPS) and GPS chips which triangulate from the GPS satellites' signals. There is also Assisted Global Positioning Systems (A-GPS), which uses a combination of mobile devices, GPS servers, and GPS satellites to determine the position of a device. These technologies, however, have limitations.

GPS and A-GPS work best in "open sky" environments, but it is well documented that they do not work well indoors, or in cities with tall buildings since the device does not have a clear line of sight with positioning satellites. There can be long latency effects, with location calculations sometimes taking 30 seconds to several minutes to calculate a position.

In contrast, a high-yield, location technology, Uplink Time Difference of Arrival (U-TDOA), relies upon triangulation using fixed sensors, and provides reliable locations in urban and indoor environments. Completely network-based, (public or private), no additional chip or software needs to be installed into the handset, which means it can locate all cell phones or any device that emits RF energy using a U-TDOA-equipped wireless network.

Clearly, it is critical to select the right location technology (or technologies) to meet the high precision and performance required for homeland security applications. Only TruePosition offers all of these major location technologies to ensure accurate location for any cell phone or RF device:

- Uplink Time Difference of Arrival (U-TDOA)
- Assisted Global Positioning Systems (A-GPS)
- Cell ID
- Enhanced Cell ID (E-CID)
- Angle of Arrival (AOA)

Many homeland security situations require location data in order to provide the information needed to protect and save lives. TruePosition offers a solution-based approach to determine the best location technology for your application. We will work with your agency to provide a tailored solution to meet your specific needs.

About TruePosition, Inc.

With more than a decade of experience and unrivaled technical expertise, TruePosition is the largest company solely dedicated to wireless location. We possess over three dozen patents in location technologies, products, and services, and currently work with several of the largest wireless providers in the world. Our technology has been deployed in numerous GSM markets, covering tens of millions of users.

TruePosition's heritage lies in the instrumental role it has played in delivering the levels of accuracy, resiliency, consistency, and reliability required by the 'E-911' mandate in the United States, resulting in the world's largest deployment of high-accuracy wireless location. Our network-based U-TDOA (Uplink Time Difference of Arrival) solution is unique in its ability to locate all existing and future handsets, even indoors or in obstructed areas. It has been proven to be the dominant technology for the delivery of E-911 services on the country's GSM networks, and is currently being deployed across the U.S. for two of the three national GSM operators.

TruePosition is a subsidiary of Liberty Media Corporation (NYSE: L, LMC.B).

Government Markets:

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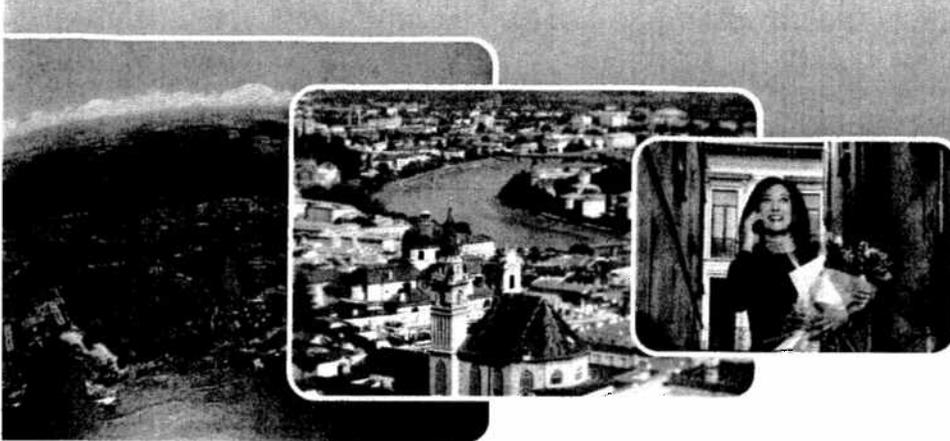
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 **Global Wireless
Location Solutions**

With TruePosition,
you can count on:

- A future-proof location platform that can be uniquely upgraded over time to achieve greater accuracy and incorporate new location services
- A best of breed approach that leverages the broadest portfolio of location technologies
- Quality of service that optimizes performance to your customers' devices and environments, resulting in high customer satisfaction
- Ultimate control and flexibility in the design and evolution of your LBS program
- The ability to quickly and easily launch services, activate subscribers, and increase demand

TruePosition is the world leader in high-performance location solutions. We deliver unmatched experience, best of breed technology, and an integrated end-to-end approach that ensures success.

Technology. Applications. End-to-End LBS.

Whether you are planning to launch Location Based Services (LBS) or have already introduced LBS to your current subscribers, TruePosition has the proven expertise to help you take LBS to the next level. Combining next-generation technology and global resources, we can help you fully capitalize on the revenue potential of LBS and deliver the high quality of service your customers demand.

With unrivaled performance, accuracy, and precision, only TruePosition has a comprehensive portfolio of next-generation location technologies, including Cell ID (CID), Enhanced Cell ID (E-CID), Assisted GPS (A-GPS), Uplink Time Difference of Arrival (U-TDOA), and more. We also offer an entire suite of phone-based and device-based applications. And, the real-world experience of successfully serving over 270 million POPs even under the most challenging conditions, including mission critical emergency number services.

The right technology. For the right application. At the right place and time.

All positioning technologies are not created equal. And, no single location technology works well for every application or in every environment. Which is why TruePosition delivers a best of breed approach, including hybrid systems that integrate multiple positioning technologies. This gives us the ability to deliver high accuracy and reliability in every environment.

We are location experts. From strategy, to technology, to integration and implementation, we can support you as much or as little as you need to make your location-based applications successful. Our systems are compatible with infrastructure equipment from all major vendors, which means that you can leverage existing investments and seamlessly integrate location services into your network. What's more, TruePosition solutions are future-proofed, to ensure that your technologies and equipment will not become obsolete over time.

When performance really matters.

Working by your side, TruePosition can help you identify which applications are best suited to each target market and environment, and ensure that each application meets necessary quality-of-service and performance requirements.

Here is a small sample of the applications we can provide:

Safety and Security

- Criminal Tracking/Surveillance
- Family Monitoring
- Personal Medical Alert
- Emergency Number Service (E-911, E-112, etc.)

Enterprise

- Workforce Management
- Asset Tracking
- Location-based Advertising

Consumer

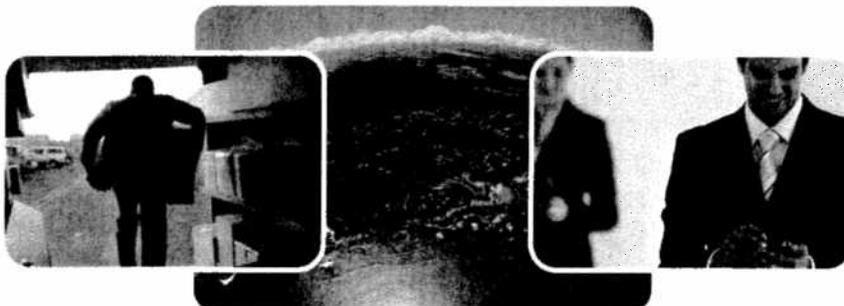
- Local Search
- Traffic
- Navigation

TruePosition. Global Wireless Location Solutions.

With more than 15 years of experience and unrivaled technical expertise, TruePosition is the largest company solely dedicated to location-based technologies and services in the world. Working with operators on a global basis, we provide technology and applications to over 270 million POPs, successfully deploying end-to-end location solutions that deliver high quality of service and exceptional customer experiences.

TruePosition is a subsidiary of Liberty Media Corporation, whose businesses include some of the world's most recognized brands, including Discovery Channel, Animal Planet, DIRECTV, QVC, Starz, and IAC/InterActive Corp.

To learn more about how we can deliver the technology, applications, and experience to drive your LBS success, visit trueposition.com.



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End-to-End Location Solutions

The location technology, applications, and support you need to quickly and successfully launch Location Based Services.

Technology. Applications. End-to-End LBS.

- TruePosition delivers everything you need for rapid implementation and ongoing success
- Single point of contact. Single technology platform. Our systems are certified compatible with infrastructure equipment from all major vendors
- The ability to quickly launch services, activate subscribers, and increase revenues
- TruePosition solutions are future-proofed — your technologies and equipment will not become outdated over time

TruePosition's end-to-end approach speeds your time to market, reduces technological barriers and technological complexity, and helps you gain a faster return on investment.

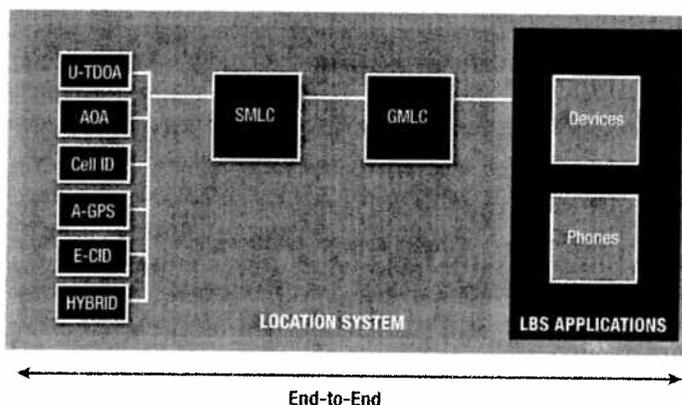
Location Based Services offer many exciting opportunities for new revenues and new ways to engage subscribers and drive ARPU. However, there are many strategy, technology, and implementation hurdles that must be overcome to successfully implement and operate a high-performance location system. So, in addition to providing world-class technology, TruePosition can also provide the strategy and support to seamlessly integrate LBS applications into your network, and into your business.

Our end-to-end approach speeds your time to market, maintains high quality of service, and can even evolve over time. There is no sorting through multiple vendors or weighing different technologies. Our experts will work with you — solving the challenges, removing the barriers, and lowering the cost of entry — thereby making it easier than ever for you to ensure ROI from day one.

Proven Best of Breed Technology.

Our location technologies can be combined to meet the needs of any market or environment. Built on a flexible foundation, they can be tuned to the optimum level of performance and accuracy, with a migration path that makes it easy to incorporate new location services over time.

End-to-End Solutions.



TruePosition offers a totally integrated end-to-end approach that consists of leading location technologies, powerful applications, and all the support you need to ensure your success.

Positioning Determining Equipment (PDE)

Our PDE meets the quality of service requirements in varying environments and market conditions, frequently exceeding the capabilities of any single location technology. And you will not be locked into any particular PDE. TruePosition offers every major PDE technology, including U-TDOA, A-GPS, E-CID, and more — even the ability to provide high-performance hybrid solutions, which harness the best qualities of multiple location techniques.

Serving Mobile Location Center (SMLC)

Unlike competitors' SMLCs, ours is compatible with all location technologies. Both flexible and scalable, our SMLC can combine two or more technologies into a hybrid version to provide the highest accuracy and broadest location coverage possible.

Gateway Mobile Location Center (GMLC)

Our GMLC supports the performance requirements of your applications, easily integrates with your back office systems and wireless network, and enables the rapid deployment of services.

Next-Generation Location Applications.

We offer a full array of location applications — developed by TruePosition and some of the industry's leading application developers. Working by your side, we can help you identify which applications are best suited to each target market and environment, and ensure that each application meets necessary quality-of-service and performance requirements.

Here is a small sample of the solutions we can provide:

Safety and Security

- Criminal Tracking/Surveillance
- Family Monitoring
- Personal Medical Alert
- Emergency Number Service (E-911, E-112, etc.)

Enterprise

- Workforce Management
- Asset Tracking
- Location-based Advertising

Consumer

- Local Search
- Traffic
- Navigation

TruePosition. Global Wireless Location Solutions.

With more than 15 years of experience and unrivaled technical expertise, TruePosition is the largest company solely dedicated to location-based technologies and services in the world. Working with operators on a global basis, we provide technology and applications to over 270 million POPs, successfully deploying end-to-end location solutions that deliver high quality of service and exceptional customer experiences.

TruePosition is a subsidiary of Liberty Media Corporation, whose businesses include some of the world's most recognized brands, including Discovery Channel, Animal Planet, DIRECTV, QVC, Starz, and IAC/InterActive Corp.

To learn more about our dynamic end-to-end approach, visit trueposition.com.



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Technology Overview

Combining a flexible, scalable platform with an integrated end-to-end approach, TruePosition's best of breed technology eliminates risk and ensures LBS success.

Highlights

- All Major Positioning Technologies:** TruePosition offers every major PDE (Position Determining Equipment) technology, including Cell ID, E-CID, U-TDOA, A-GPS, AOA, as well as hybrid solutions
- Comprehensive SMLC:** the world's most proven SMLC (Serving Mobile Location Center) which supports all major PDE technologies and systems, with the unique ability to accommodate multiple technologies at once
- Industry Leading GMLC with Middleware:** making the connection between the application and the SMLC, GMLC solutions give operators maximum control over the way location services are tailored to meet the needs of subscribers

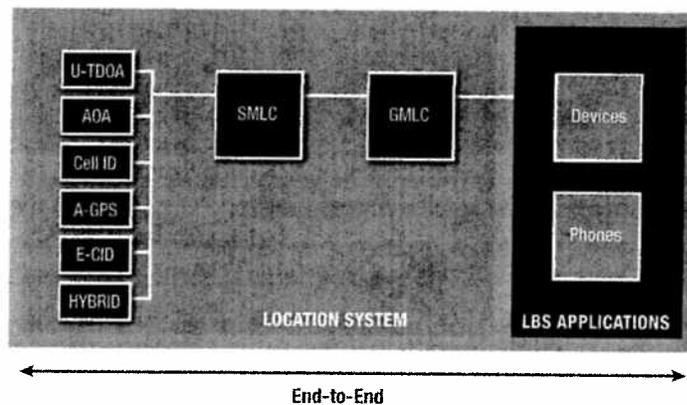
A complete end-to-end location technology system. Hardware, software, and middleware tuned to the exact level of accuracy and performance you need.

As the demand for location services has grown, the technology that makes location services possible has only grown more confusing and complex. There are literally dozens of vendors, all providing different pieces of the puzzle.

Rather than investing the time and resources integrating disparate vendors yourself, TruePosition can provide a total end-to-end approach — ensuring high quality of service, seamless network integration, faster time to market, and most importantly, exceptional customer experiences.

We are location experts, with more than 15 years of real-world experience. From strategy, to technology, to integration and implementation, we can support you as much or as little as you need to make your network and applications successful. Our systems are compatible with infrastructure equipment from all major vendors, which means that you can leverage existing investments and seamlessly integrate location services into your network. What's more, our solutions are future-proofed, meaning your technologies and equipment will not become outdated over time.

End-to-End Solutions.



From PDE to middleware to applications, TruePosition can provide a turnkey end-to-end location solution. Selecting from best of breed technologies that ensure high performance and quality of service.

PDE (Position Determining Equipment).

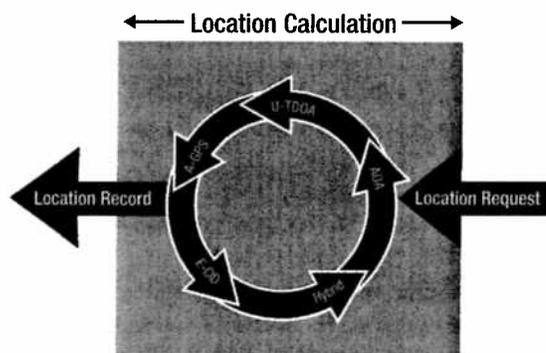
All positioning technologies are not created equal. And, no single location technology works well for every application or in every environment. Which is why TruePosition delivers a best of breed approach, including hybrid systems that integrate multiple positioning technologies. This gives us the ability to deliver high accuracy and reliability in every situation and environment.

- **U-TDOA:** Uplink Time Difference of Arrival. Utilizes low-cost LMUs installed in the operators' base stations to precisely calculate location using triangulation
- **A-GPS:** Assisted Global Positioning System. Utilizes modified handsets that contain a GPS receiver and special SUPL network server to assist in location calculation
- **E-CID:** Enhanced Cell ID. Derives additional timing advance and power measurements from the wireless network
- **AOA:** Angle of Arrival. Utilizes two or more antennas containing multiple element arrays, allowing the exact location of each AOA element to be precisely calculated
- **Hybrid:** Any combination of location technologies to achieve optimal performance for any situation

SMLC (Serving Mobile Location Center).

Acting as a central command center, the SMLC manages the overall coordination and scheduling of resources required to locate a mobile user. Receiving location requests through the wireless network or middleware system, it calculates the final position, estimates the achieved accuracy, and then fulfills the location request by reporting the location record back to the wireless network.

TruePosition's SMLC provides unmatched flexibility and versatility to manage location requests from the broadest array of technologies, and scale over time to meet both present, and future requirements.



The TruePosition SMLC has the unique ability to support multiple location technologies in one request.

GMLC (Gateway Mobile Location Center).

Through its partners, TruePosition provides the industry's leading GMLC solutions, enabling operators to have maximum control in the way location services can be tailored to meet the needs of their subscribers.

Passing location values between the application and the SMLC, the GMLC provides functionality that enables operators to introduce advanced commercial location services that protect subscriber privacy and security, manage and prioritize location service requests, and integrate with network and enterprise elements, including provisioning systems and billing systems.

TruePosition. Global Wireless Location Solutions.

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