



APCO International

Association Of Public-Safety Communications Officials-International, Inc.

EXECUTIVE DIRECTOR
George S. Rice, Jr.
riceg@apcointl.org

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APCO INTERNATIONAL
351 N Williamson Boulevard
Daytona Beach, FL 32114-1112
Phone: 888-APCO911 OR 386-322-2500
www.apcointl.org

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

**OFFICE OF GOVERNMENT
AFFAIRS**
1725 DeSales Street, N W , Suite 808
Washington, DC 20036
Phone 202-833-2700
dcoffice@apcointl.org

RE: Docket 94-102

BOARD OF OFFICERS

PRESIDENT
Wanda S. McCarley
Operations Manager
Tarrant County 911 District
100 East 15th Street
Fort Worth, TX 76102
Phone 817-820-1185
president@apcointl.org

PRESIDENT - ELECT
Willis Carter
Chief of Communications
Shreveport Fire Department
1144 Texas Avenue
Shreveport, LA 71101
Phone 318-675-2200
pres-elect@apcointl.org

FIRST VICE PRESIDENT
Chris Fischer
Director
Valley Communications
27519 108th Avenue, S E
Kent, WA 98030
Phone 253-372-1510
first-vp@apcointl.org

SECOND VICE PRESIDENT
Richard A. Mirgon
Communications Director
Douglas County
1615 8th Street
Minden, NV 89423-4232
Phone 775-782-9977
second-vp@apcointl.org

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Ing. Manfred Blaha, Brigadier-General
Technology Advisor for the National
Crisis and Disaster Protection Mgmt.
Republic of Austria
Federal Ministry of the Interior, Dept IV/8
ICT Infrastructure and Operations
Türkenstraße 22, A-1090 Vienna
Phone: +43-1-90600 / 88 308
international-vp@apcointl.org

Dear Ms. Dortch:

This is to inform the Commission that APCO International President Wanda McCarley, Second Vice-president Richard Mirgon, and the undersigned, met with Barry Ohlson in Commissioner Adelstein's office and Aaron Goldberger in Commissioner Tate's office on May 17, 2007, to discuss APCO's pending Request for Declaratory Ruling in this proceeding. We reiterated our view that location accuracy under the Commission's wireless E9-1-1 rules should be measured at the PSAP level.

We also indicated in the meetings that, if the Commission determines that it must address this issue through a notice of proposed rulemaking, the proceeding should be conducted in an expedited fashion. A final decision defining PSAP service area as the relevant area of measurement for wireless E9-1-1 accuracy should be adopted quickly, and well in advance of other E9-1-1 issues that require more extended consideration. Specifically, on the PSAP-level accuracy question, we recommend a very brief comment period (e.g., 14 days for comments and 7 days for replies) and a rapid Commission order on that issue (e.g., within 21 days). We have no specific recommendation at this time regarding an appropriate comment period for the other issues to be considered.

Please contact the undersigned should the Commission require any additional information regarding this matter.

Respectfully submitted,

Robert M. Gurs
Director of Legal and Government Affairs

cc: Aaron Goldberger
Barry Ohlson