



August 30, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Communication: *Wireless E911 Location Accuracy Requirements*, PS Dkt. No. 07-114, WC Dkt. No. 05-196 (NPRM Sections III.A & III.B)

Dear Ms. Dortch:

Yesterday, Kathleen O'Brien Ham, Amy Wolverton, and I from T-Mobile USA, Inc. ("T-Mobile") and William Maher from Morrison & Foerster LLP on behalf of T-Mobile met with Commissioner McDowell, John Hunter and Angela Giancarlo to discuss issues arising in the above-referenced proceedings.

T-Mobile understands that the Commission is considering the adoption of a rule requiring CMRS carriers to meet the E911 accuracy requirements in 47 C.F.R. §20.18(h) at the PSAP-level for every PSAP in the country, and to require compliance with this new requirement within one year. While T-Mobile supports achievement of the best possible location accuracy performance, the requirement the Commission is reportedly considering would be arbitrary and capricious because the record clearly establishes that there are no technical solutions that will permit CMRS carriers to meet that requirement. In addition, T-Mobile noted that unintended consequences could result from such a requirement – carriers would be less likely to build out or provide service to rural areas where it would be too difficult to meet 911 accuracy standards.

Instead, as outlined in its filed comments, T-Mobile reiterated a three-step proposal to improve accuracy now and maximize long-term public safety benefits. As illustrated in the attached presentation, T-Mobile explained that Stage 1 of the proposal requires optimization of existing technologies at the PSAP level. Stage 2 immediately establishes an advisory committee, and Stage 3 adopts and implements any new standards.

One electronic copy of this ex parte notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

/s/ Thomas J. Sugrue _____
Thomas J. Sugrue
Vice President Government Affairs

Attachment

T-Mobile USA, Inc.
401 9th Street, NW Suite 550
Washington, DC 20004

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cc: Commissioner Robert McDowell
John Hunter
Angela Giancarlo