

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In The Matter Of)	
)	
Wireless E911 Accuracy Requirements)	PS Docket No. 07-114
)	
Revision of FCC's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Association of Public-Safety Communications)	
Officials-International, Inc. Request)	
Declaratory Ruling)	
)	
911 Requirements for IP-Enabled Service)	WC Docket No. 05-196
Providers)	
_____)	

Declaration of James DeLoach

I, James DeLoach, do hereby declare as follows:

I. Background

1. My name is James DeLoach. I am employed as a Principal Engineer/Manager in the Engineering Services Group at QUALCOMM Incorporated ("QUALCOMM"). I am making this declaration in connection with the comments that QUALCOMM has filed with the Federal Communications Commission ("FCC") in the above-referenced proceedings.
2. Since 1999, I have been employed by QUALCOMM and SnapTrack, Inc., a wholly-owned QUALCOMM subsidiary and a pioneer of Assisted-GPS technology, to incorporate Qualcomm's gpsOne location technology into America's 911 networks. In the course of this work, I have analyzed the performance of numerous complex location systems in order to troubleshoot problems for wireless carriers, and have led many field test exercises. I have

developed a deep expertise in the use of database and GIS tooling for analyzing the performance of, and optimizing a carrier's implementation of wireless position location technology.

3. I have managed location technology trials and demonstrations for wireless carriers around the world and taught classes on location technology for carrier personnel. In addition, earlier in my career, I led a team of 18 engineers who were responsible for field testing and systems testing of QUALCOMM's location server products.

4. In addition, I have authored numerous technical papers, test plans and test reports on the performance of wireless location systems. Moreover, I have developed tools for visualizing location based performance and algorithms and tools to increase creation and maintenance efficiency of a cell tower database required for the proper implementation of QUALCOMM's position location technology.

II. QUALCOMM's Comments

6. I hereby affirm that the statements in QUALCOMM's Comments filed in these proceedings on July 5, 2007 and August 20, 2007 are true and correct. In particular, I affirm that to my knowledge, now and in the foreseeable future, none of the currently available position location technologies will enable a wireless carrier to meet the FCC's accuracy rules in every PSAP. There will always be some PSAP regions where conditions are particularly disadvantageous and far different from most of the country. Thus compliance on a PSAP-by-PSAP basis across all of the nation's various PSAPs is not possible.

I hereby declare under penalty of perjury that the foregoing is true and correct.

/s/ James DeLoach
James DeLoach