



OPASTCO

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September 4, 2007

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Wireless E911 Location Accuracy Requirements: PS Docket No. 07-114

Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Association of Public-Safety Communications Officials-International, Inc. Request for Declaratory Ruling: CC Docket No. 94-102

911 Requirements for IP-Enabled Service Providers: WC Docket No. 05-196

Notice of *Ex Parte* presentation

On Tuesday, September 4, 2007, Brian Ford of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), Jill Canfield of the National Telecommunications Cooperative Association (NTCA), and Michael Bennet and James Egyud of the Rural Telecommunications Group (RTG) (collectively, the "Associations") met with Angela Giancarlo from Commissioner McDowell's office to discuss issues related to the Commission's wireless E911 location accuracy rules. The Associations expressed their concern that compliance with the Commission's Phase II E911 location accuracy standards is technically infeasible and economically impracticable for rural wireless carriers. The Associations proposed that the Commission adopt a transition plan proposed by RTG, a handset-based E911 solution that would be coupled with an industry forum designed to develop location accuracy standards that are realistically achievable for rural carriers.

Sincerely,

Brian Ford
Regulatory Counsel
OPASTCO