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ATTORNEYS AT LAW

September 7, 2007

Ex Parte

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

Re: *In the Matter of Wireless E911 Location Accuracy Requirements*, PS
Docket No. 07-114, WC Docket No. 05-196

Dear Ms. Dortch:

On September 7, 2007, Kathleen Ham, Managing Director, Federal Regulatory Affairs, and Jim Nixon, Director, Government Affairs of T-Mobile USA Inc. (T-Mobile) and John Nakahata, of Harris, Wiltshire & Grannis on behalf of T-Mobile, met with Commissioner Robert McDowell, and Ms. Angela Giancarlo, Legal Adviser to Commissioner McDowell. The attached presentation and letter were provided, and summarized T-Mobile's presentation.

We also separately respond to the ex parte letters filed by Association of Public-Safety Communications Officials-International, Inc. ("APCO") and the National Emergency Number Association ("NENA"), dated September 6, 2007, and by AT&T, dated September 6, 2007. These ex partes do not provide any further basis for setting a date certain for PSAP-level compliance with Rule 20.18(h), 47 C.F.R. 20.18(h), whether of one year, as it was rumored the FCC was considering, or 5 years, as suggested by NENA and APCO, or of any other duration. None of these entities actually proposes setting a date certain for full compliance. Neither AT&T nor NENA/APCO identify any specific solution, including one that involves changing handsets, which would allow carriers to comply with Rule 20.18(h) at every PSAP. Thus, even if carriers could change handsets in five years, which is likely too short based on the Commission's experience with the CDMA carriers, there is no basis for a five-year date certain deadline for compliance with Rule 20.18(h) at the PSAP-level.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata". The signature is fluid and cursive, with the first name "John" being particularly prominent.

John T. Nakahata
Counsel to T-Mobile USA, Inc.