

September 11, 2007

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

Re: *Ex Parte Notification*
PS Docket No. 07-114, CC Docket No. 94-102, WC Docket No. 05-196

Dear Ms. Dortch:

On September 10, 2007, in accordance with Section 1.1204(a)(10)(iv) of the Commission's rules, the undersigned, on behalf of Verizon Wireless, had a telephone conversation with Renée Crittendon, Legal Advisor to Commissioner Jonathan Adelstein, in response to her inquiry regarding a September 7, 2007 *ex parte* presentation submitted by APCO and NENA. Verizon Wireless stated there is no evidence in the record to support *any* of the interim benchmarks or the five-year PSAP-level compliance deadline that APCO and NENA propose, and it referenced the legal issues raised in the August 31, 2007 *ex parte* presentation submitted by the Rural Cellular Association and Verizon Wireless. Verizon Wireless observed further that any adoption of benchmarks exacerbates the legal issues here because the Commission explicitly sought comment on the use of benchmarks in Part Two of the *Notice of Proposed Rulemaking* – and the Part Two comment period does not close until September 18, 2007. Finally, benchmark requirements in any event are inextricably intertwined with location technology capabilities raised in Part Two.

Pursuant to Sections 1.1204(a)(10)(iv) and 1.1206(b) of the Commission's rules, this *ex parte* notification is being filed electronically with your office.

Respectfully submitted,

/s/

Kathryn Zachem

cc: Renée Crittendon