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May 2, 2008

VIA ELECTRONIC DELIVERY

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

Re: Notice of *Ex Parte* Presentation

In the Matter of 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 (CC Docket No. 94-102); 911 Requirements for IP-Enabled Service Providers (WC Docket No. 05-196)

Dear Ms. Dortch:

On Thursday, May 1, 2008, F. Willis Caruso, Jr., Vice President and Assistant General Counsel Global Commercial Law/Andrew Corporation, Tom Gravely, Vice President- Product Development/Andrew Corporation, Andrew Beck, Director- Product Development /Andrew Corporation, Karl Kessenich, Director-Geometrix/Andrew Corporation, and George Marble, Director-Business Development/Andrew Corporation met with James Miller, Attorney Advisor/OET, Ziad N. Sleem, Associate Division Chief/WTB, Paul L. Marrangoni, Electronics Engineer/PSHS, Ronald T. Repasi, Deputy Chief/OET, Chip Fleming, OET, Salomon Satche, OET, and Ahmed Lahjouji, OET at the invitation of the FCC to discuss performance capabilities of wireless caller locating technologies.

We reviewed primary, secondary, and hybrid locating technologies and their basic performance characteristics in various operational environments. Andrew discussed ranges of performance experienced and to be expected, and noted clearly that actual performance in the field is subject in every case to the actual deployment and environmental characteristics.

Andrew's comments during this meeting were consistent with the positions Andrew has set forth in its filing in the above referenced proceeding. In particular, Andrew re-iterated that it believes there are solutions available to improve the "yield" of caller locations that meet the FCC's performance objectives for E911 Phase II, but that Andrew does not believe that there is currently a technological basis for tightening the location accuracy objectives.

Andrew distinguished its use of the terms “hybrid” and “fallback” location technology as follows: “Fallback” refers to the use of a location result from a secondary location technology if the primary location technology fails to produce a location. Each technology attempts to produce a location result independent of one another. Fallback can be simplified as “Technology A OR Technology B”. “Hybrid” methods, in contrast, are defined as unique methods that combine and integrate measurement and other data from multiple location technologies to produce a resultant single location. The measurements from these technologies are used in conjunction to produce a location result. Hybrid can be simplified as “Technology A AND Technology B”. Hybrid methods frequently can calculate a reliable caller location when data is insufficient for a primary or secondary method alone to do so.

Pursuant to Section 1.1206 of the Commission’s rules, an electronic copy of this letter is being submitted via the Commission’s Electronic Comment Filing System. If you have any questions, please do not hesitate to contact me at (708) 236-6462.

Sincerely,

/s/ F. Willis Caruso, Jr.

F. Willis Caruso, Jr.
Vice President and Assistant General Counsel
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Andrew Corporation