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May 16, 2008

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BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: *Ex Parte* Presentation of Polaris Wireless, Inc.
PS Docket No. 07-114, CC Docket No. 94-102, and WC Docket No. 05-196

Dear Ms. Dortch:

On May 15, 2008, Polaris Wireless, Inc. ("Polaris") representatives Martin Feuerstein, Chief Technology Officer, and Steve Snider, Vice President, Global Sales, along with the undersigned, counsel to Polaris, met with Julius Knapp, Ronald Repasi, Nicholas Oros, James Miller, Salomon Satche, and Patrick Forster of the Office of Engineering and Technology; Paul Marrangoni of the Public Safety and Homeland Security Bureau; Chip Fleming of the International Bureau; and Ziad Sleem of the Wireless Telecommunications Bureau. Polaris also met separately with Jeff Cohen, Walter Johnston, and David Munson of the Public Safety and Homeland Security Bureau. During the meetings, Polaris responded to questions about its Wireless Location Signatures ("WLS") and hybrid technology and distributed the attached presentation regarding recent location accuracy test results for urban and indoor environments.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, I am filing this notice electronically in the above-referenced dockets. Please contact me directly with any questions.

Respectfully Submitted,

/s/ Michele C. Farquhar

Michele C. Farquhar
Counsel to Polaris Wireless, Inc.

Enclosures

cc: Julius Knapp
Jeff Cohen
Chip Fleming
Patrick Forster
Walter Johnston
Paul Marrangoni
James Miller
David Munson
Nicholas Oros
Ronald Repasi
Salomon Satche
Ziad Sleem

Polaris Wireless
Price/Performance Leader for Wireless Location

Recent Location Accuracy Test Results for Urban and Indoor Environments

May 15, 2008

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Wireless Location Signatures (WLS)

- **Signatures based on standard radio network measurements (signal levels, time delays, etc.)**
- **Pattern-match against a prediction database to estimate location**
- **Software-only approach as a stand-alone service / no radio hardware network overlay**

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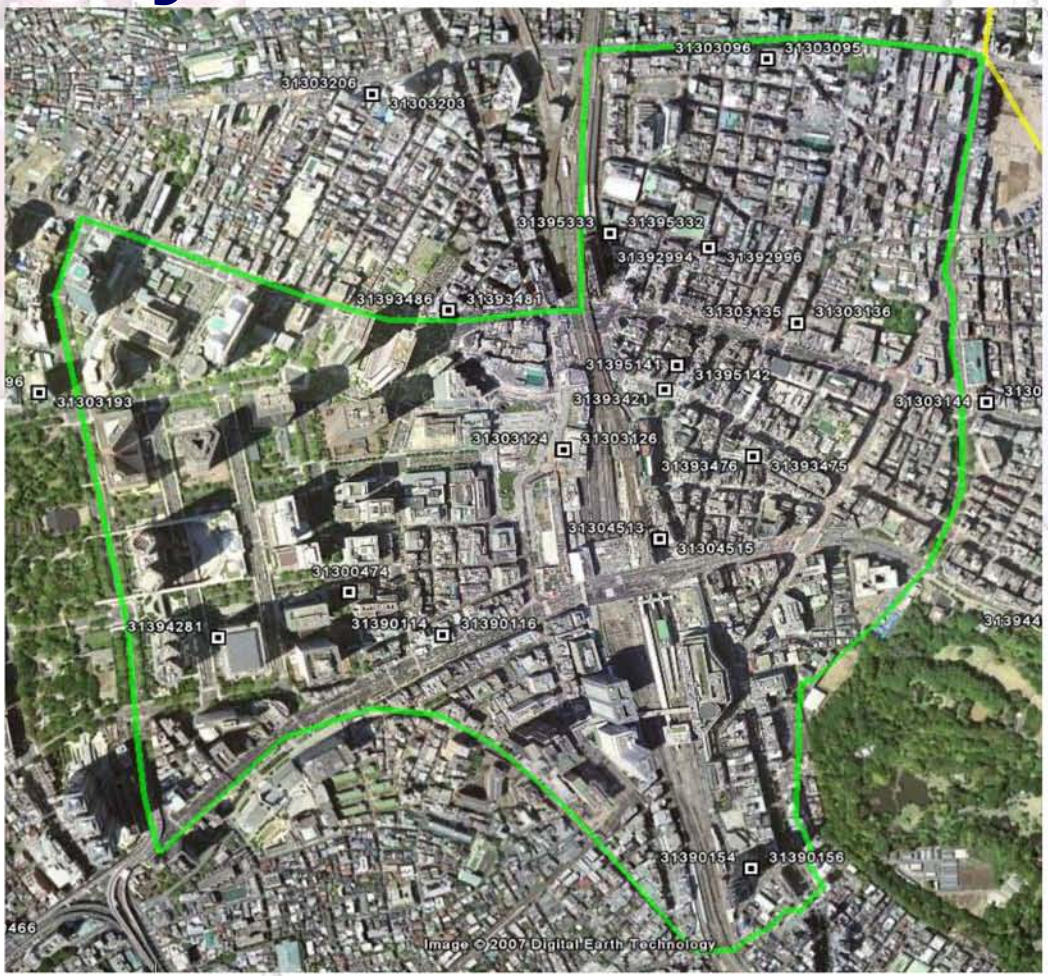
Tokyo UMTS Urban Trial Area



70 UMTS Sectors
22 UMTS Sites

Test Area is 1.6 sq km

Average inter-site distance is 200 meters

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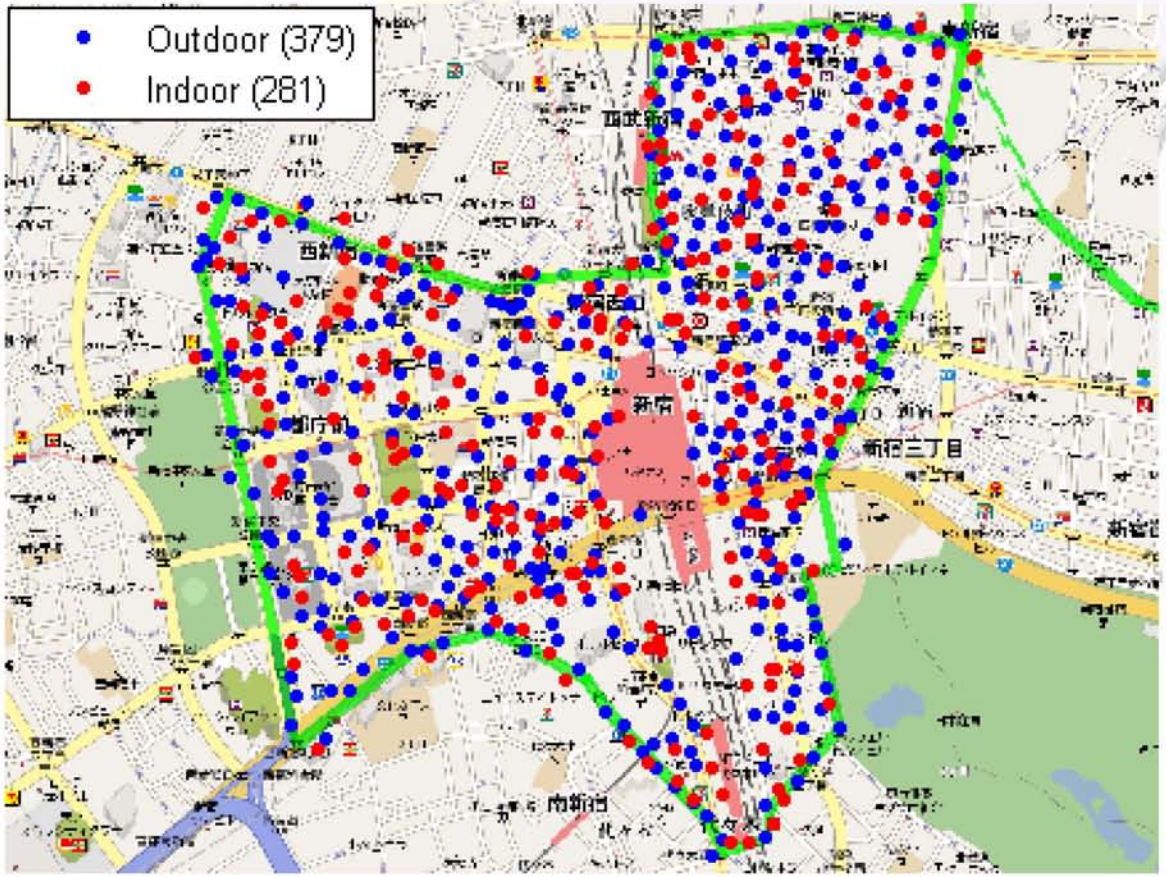
Tokyo Urban Test Point Coverage

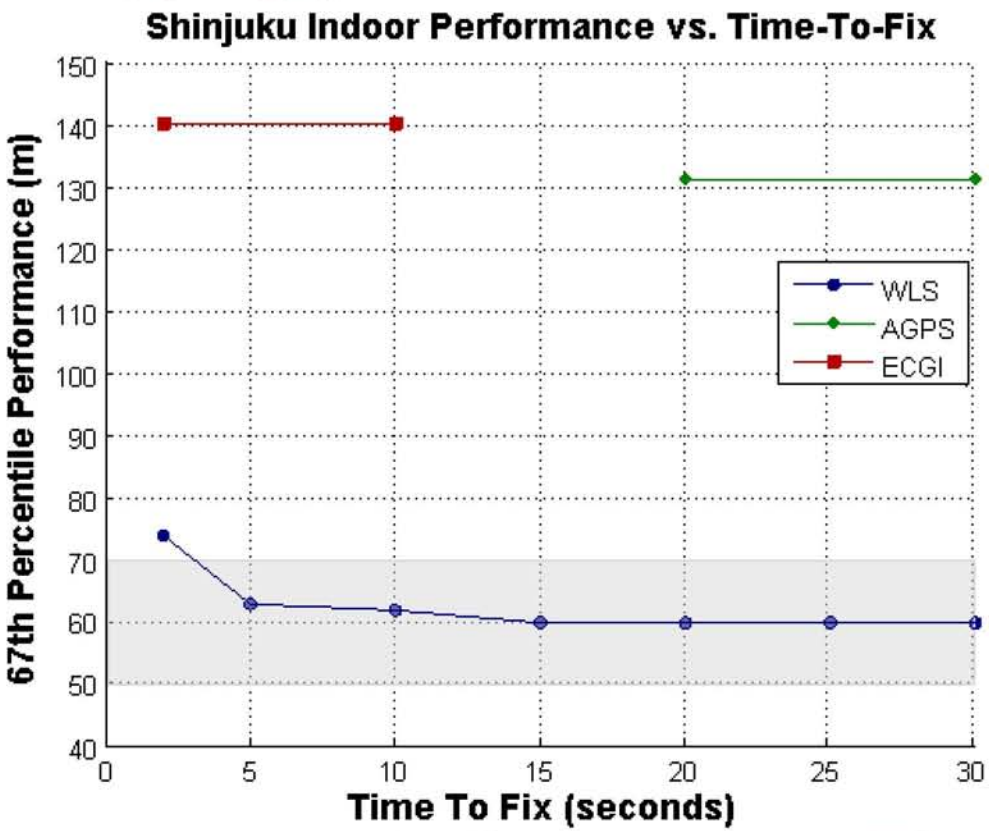
379 Outdoor Points

281 Indoor Points

~40-Meter Spacing



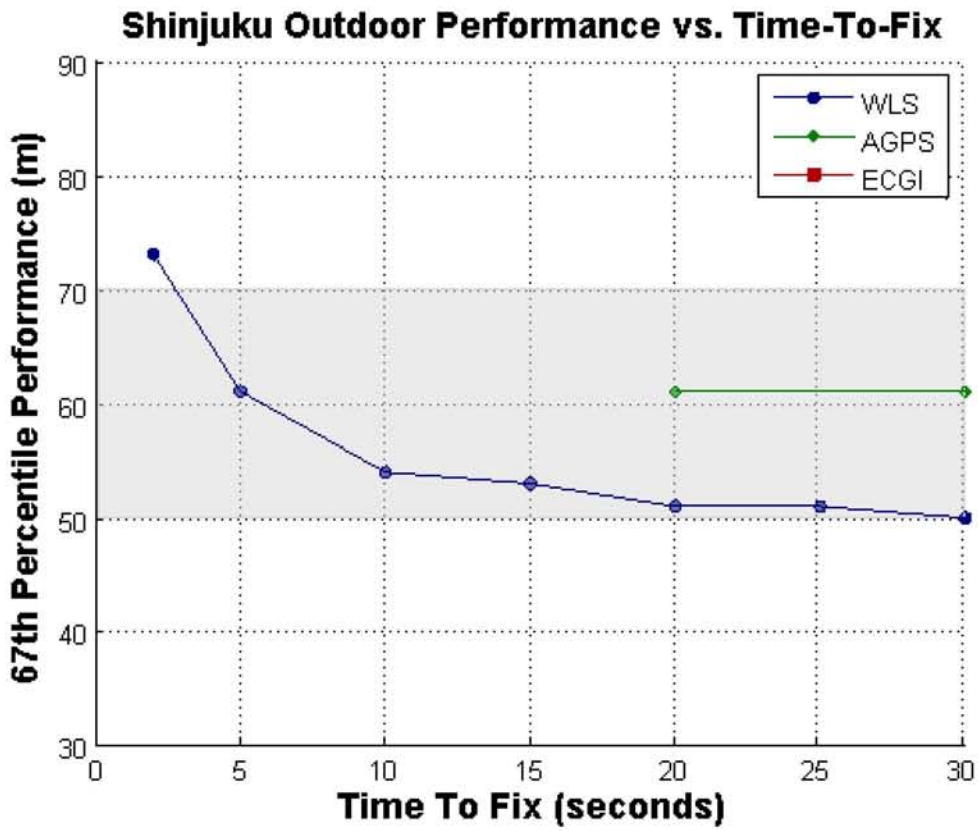
Trial Results: Urban Indoor



- *Indoor Test Points in Urban Area*
- *Shaded area is the desired accuracy*
- *A-GPS performance marked in Green*
- *ECGI (Enhanced Cell Global Identity) marked in Red*
- *WLS performance indicated in Blue for different time-to-fix with 100% location yield*

WLS Meets Performance Objective with Time-to-Fix of 5 Seconds

Trial Results: Urban Outdoor



- *Outdoor Test Points in Urban Area*
- *Shaded area is the desired accuracy*
- *A-GPS performance marked in Green (A-GPS time-to-fix is between 20-30 sec.)*
- *WLS performance indicated in Blue for different time-to-fix with 100% location yield*

WLS Meets Performance Objective with Time-to-Fix of 5-10 Seconds

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Blind Trial by Mobile Operator in Toronto on UMTS and GSM

243 GSM Sectors
132 UMTS Sectors

Test Area is 10 sq km

Average inter-site distance is 250 meters

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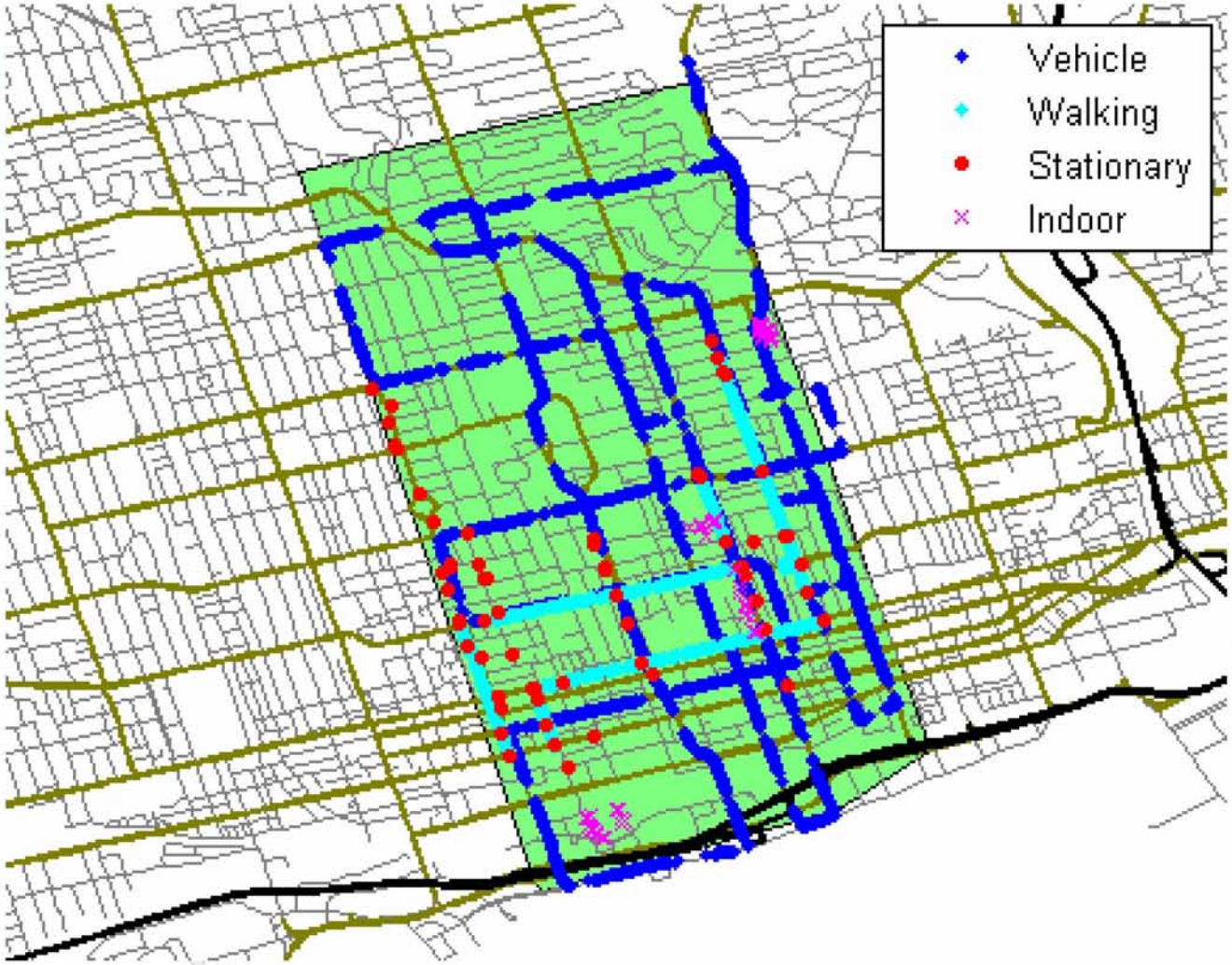
Toronto Test Locations



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Toronto Trial Results

GSM	Test Type	Location System	67% Error (m)	95% Error (m)	CEP 50 m (%)	CEP 150 m (%)
Toronto	Stationary	WLS	49	172	68.6	94.0
Toronto	Walking	WLS	52	201	65.5	89.7
Toronto	Vehicle	WLS	59	154	59.1	93.3
UMTS WCDMA	**Test Type**	**Location System**	**67% Error (m)**	**95% Error (m)**	**CEP 50 m (%)**	**CEP 150 m (%)**
Toronto	Stationary	WLS	50	139	67.0	96.1
Toronto	Walking	WLS	47	107	69.2	97.9
Toronto	Vehicle	WLS	50	150	67.2	95.1

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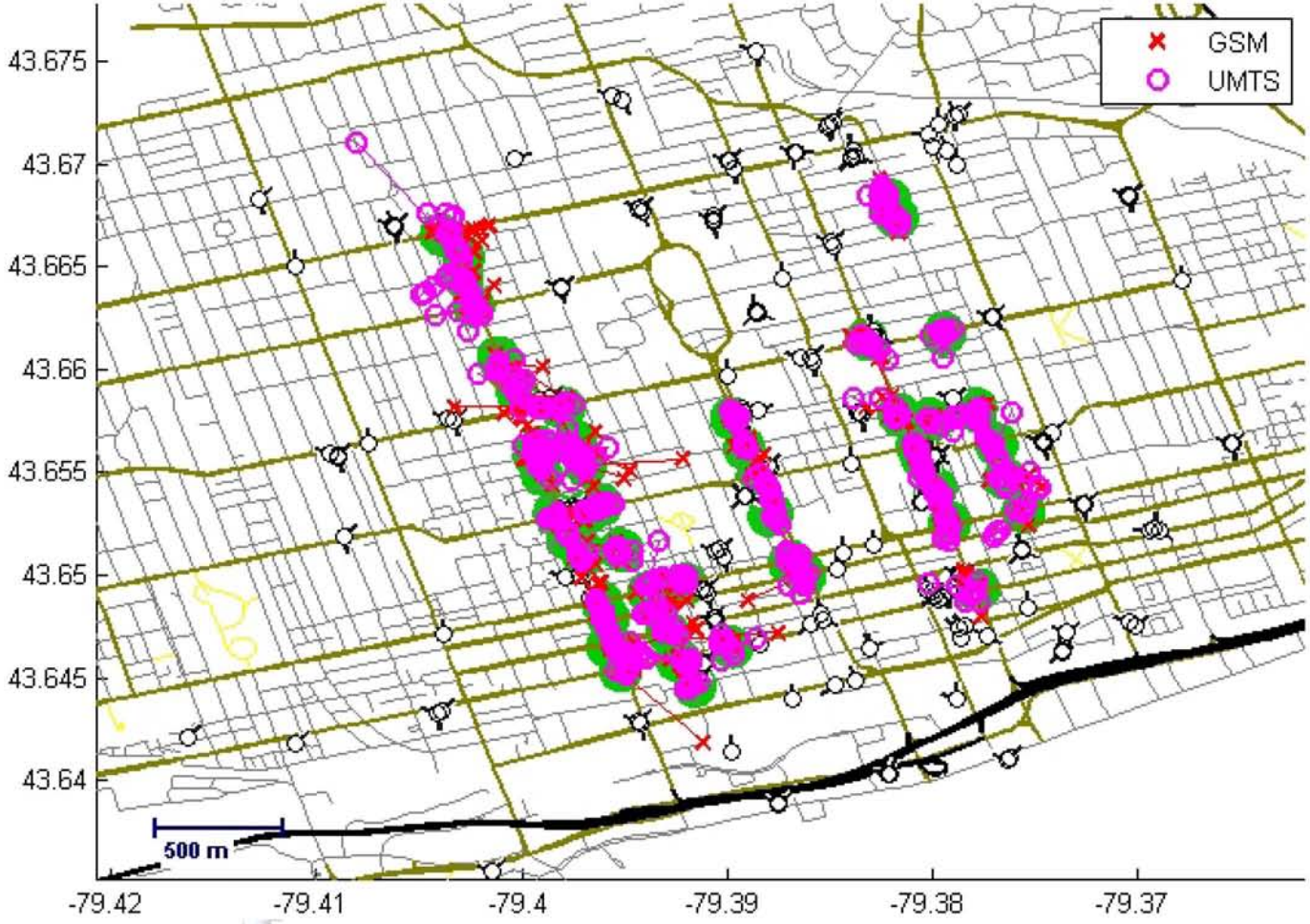
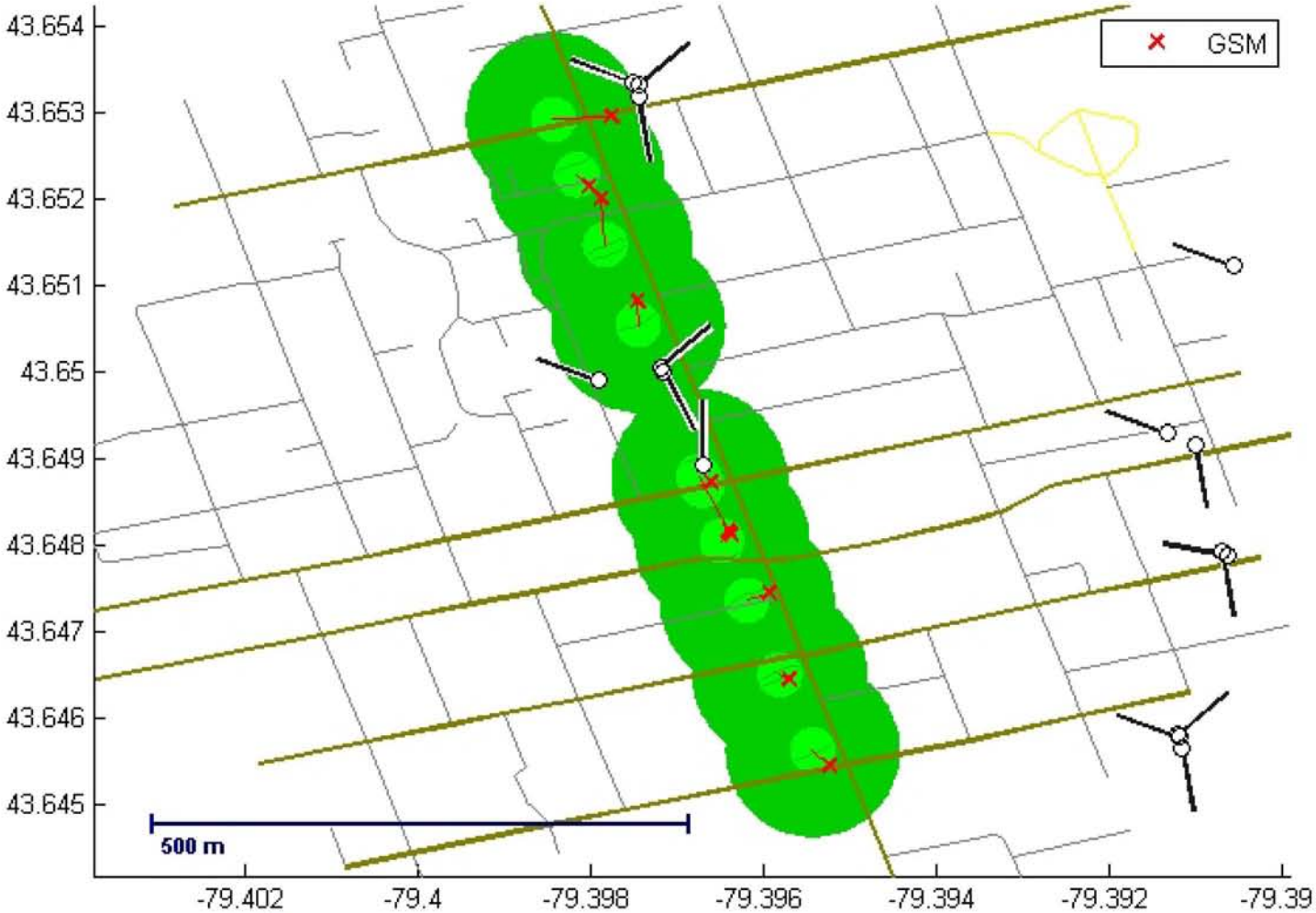
Example Stationary Points



Example Pedestrian Route



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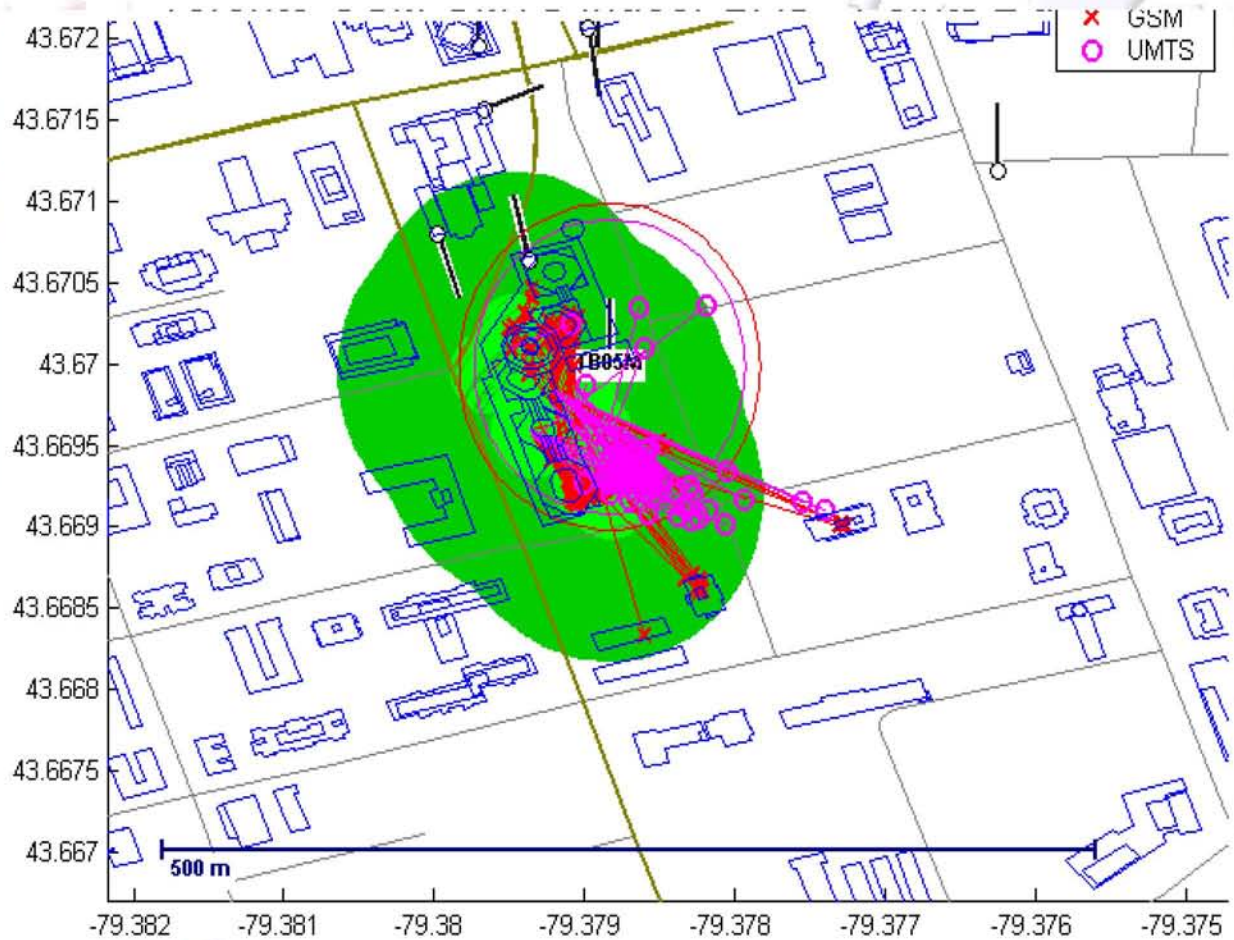
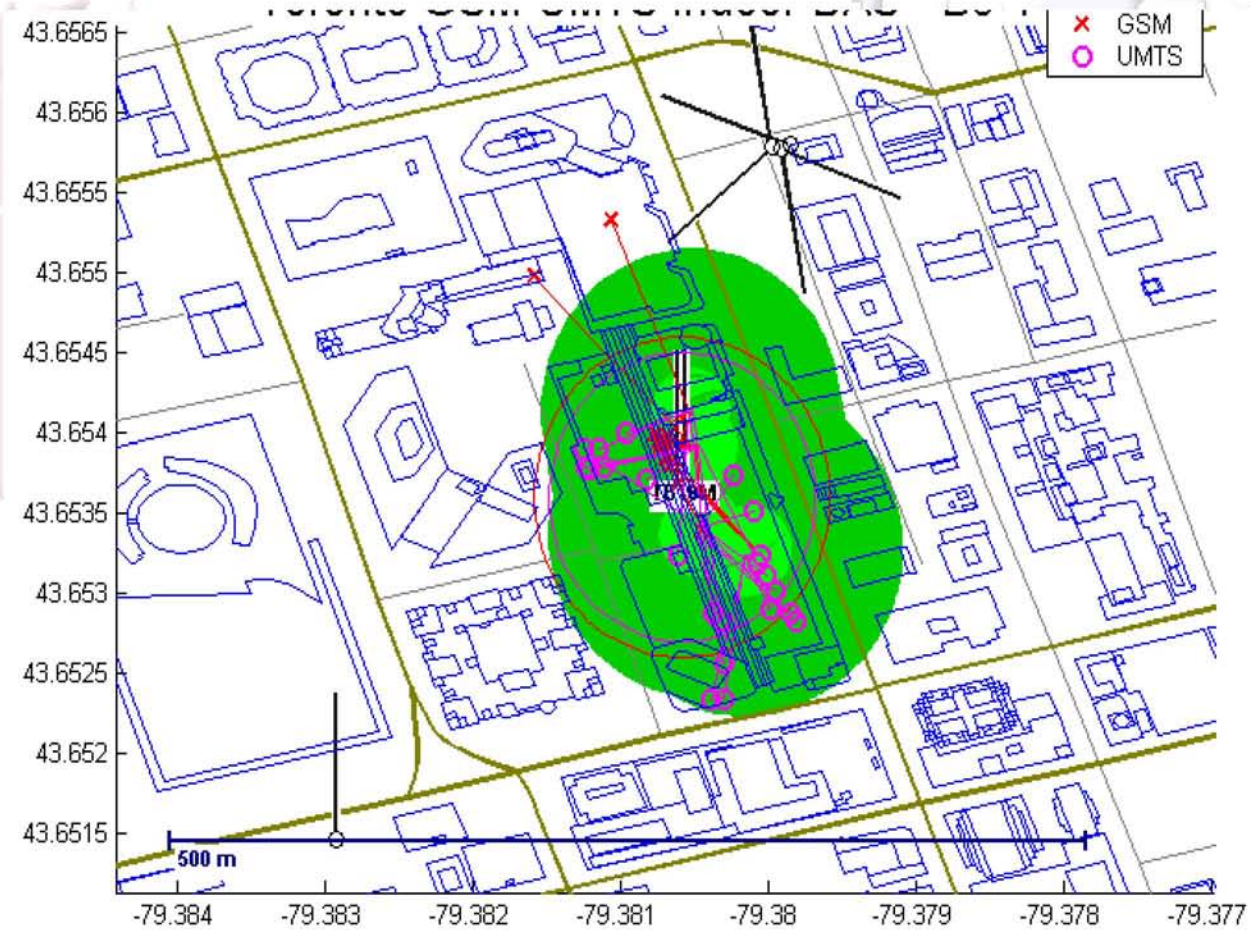
Example In-Building 1



Example In-Building 2



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Conclusions

- Trials conducted in Tokyo and Toronto demonstrate the urban performance of WLS at or near handset-based accuracy requirements
- Tokyo UMTS urban trial results for WLS
  - WLS demonstrated ability to support fast 5-10 second time-to-fix
  - 100% location fix yield
  - WLS indoor: 67% location accuracy at 60 meters in E911 time window
  - WLS outdoor: 67% location accuracy at 50 meters in E911 time window
  - To compare, A-GPS system indoor: 67% location accuracy at 131 meters in E911 time window
- Toronto UMTS and GSM urban trial results for WLS
  - UMTS outdoor: 67% location accuracy at 47-50 meters in E911 time window
  - GSM outdoor: 67% location accuracy at 49-59 meters in E911 time window