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August 21, 2008

***Via Electronic Submission***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

***Re: Ex Parte Communication; Revision of the Commission's rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket 94-102; Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114.***

Dear Ms. Dortch:

On August 20, 2008, at the request of the staff of the Office of Engineering and Technology, Sprint Nextel Corporation ("Sprint Nextel"), through its representatives Charles McKee and Steve Zweifach, met with Ronald Repasi, James Miller, and Salomon Satche of the Office of Engineering and Technology regarding location technology and the use of hybrid location systems.

During the meeting, the parties discussed the contents of the attached presentation regarding Sprint's current technology, hybrid technologies generally, and their relative performance. In particular, Sprint noted that the term "hybrid" is ambiguous and can be subject to interpretation. Sprint does not consider the overlay of a new technology on an existing system to be a "hybrid" system. True hybrid technologies incorporate data points from different sources and integrate them into a single unified system. This permits the location platform to determine the appropriate information to provide a Public Safety Answering Point ("PSAP"). Overlaying an entirely new system would be problematic, both operationally and in determining the appropriate information to provide public safety. Moreover, it would be a misconception to suggest that a new technology could be easily inserted into a single small geographic area. Integration of any new technology into the existing network would require restructuring of the national platforms that support 911 calculations.

The parties also discussed femtocells and specifically the operation of the recently launched Sprint Airave device. Sprint noted that the Airave device is a CMRS service using PCS licensed spectrum and is fully compliant with the wireless CMRS rules. Specifically, the Airave contains a GPS unit and will only operate when it is able to identify its location.

Finally, the parties also discussed the difficulties associated with the testing of wireless systems. Sprint emphasized that even with its newly installed Location Accuracy Manager

(LAM), which incorporates testing units in more than 1,400 vehicles, it is extremely time consuming and difficult to collect useful data.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Respectfully submitted,

/s/ Charles W. McKee

Charles W. McKee  
Director, Government Affairs  
Sprint Nextel Corporation

cc: Ronald Repasi  
James Miller  
Salomon Satche