



September 9, 2008

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

RE: PS Docket 07-114 and CC Docket 94-102

Dear Ms. Dortch:

The Association of Public-Safety Communications Officials-International (“APCO”) and the National Emergency Number Association (“NENA”) wish to take this opportunity to address the recent letters from Verizon Wireless and AT&T Mobility regarding their proposals for revisions to the E9-1-1 wireless location accuracy rules, as set forth in our prior joint letters with each company.

APCO and NENA agree that these proposals will promote the public interest and should be adopted by the Commission. Significantly, Verizon and AT&T have both agreed that location accuracy should be measured at the county level. This represents a substantial improvement over the measurement areas currently used by carriers and the positions they had previously advocated. As we described in our letter of July 14, 2008, county-level accuracy would in many cases be identical to PSAP-level accuracy. Counties also are more easily defined than PSAPs and are not prone to administrative boundary changes.

The joint proposals, if adopted by the Commission, also could bring an end to years of distracting debates regarding the appropriate accuracy standards. All parties will then be able to focus attention on the important, critical task of implementing and improving wireless E9-1-1 capabilities.

We also believe that the specific standards identified in the letters present a sensible approach that will achieve improved accuracy in a reasonable time frame. Most importantly, the requirements for 67% of 9-1-1 calls (50/100 meters) will be met at the county level within two years for Verizon and five years for AT&T, consistent with the five-year benchmark that APCO and NENA had previously recommended and was adopted in the last FCC order. Also, we are pleased that AT&T proposes to combine handset and network based technologies to provide improved accuracy across a variety of geographic settings.

The carriers have also agreed to provide confidence and uncertainty data on a per call basis upon receiving PSAP requests. This will greatly improve the ability of PSAPs to utilize accuracy data and manage their 9-1-1 calls. Finally, we look forward to working with the carriers to develop approaches for assessing indoor call accuracy, as wireless phones are increasingly being used to make 9-1-1 calls from inside homes and offices. Location accuracy is especially important in those settings where first responders may have difficulty locating the exact site of the emergency.

Please contact the undersigned should the Commission require any additional information.

Respectfully submitted,

/s/

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