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October 6, 2008

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114.

Dear Ms. Dortch:

The Telecommunications Industry Association (TIA) respectfully requests that the Federal Communications Commission (Commission), in the above referenced proceeding, create an E911 Technical Advisory Group (ETAG) as proposed by TIA, APCO, NENA, and AT&T. An ETAG, comprised of experts from the wireless network manufacturer, device manufacturer, service provider, and public safety sectors, will help to ensure that cross-industry and public safety concerns and expertise are considered and will encourage continued dialogue on issues of import which are not yet settled.

TIA represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshows, business opportunities, market intelligence and world-wide environmental regulatory analysis. With roots dating back to 1924, TIA enhances the business environment for broadband, mobile wireless, information technology, networks, cable, satellite and unified communications. Members' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment and entertainment. TIA co-owns the SUPERCOMM® tradeshow and is accredited by the American National Standards Institute (ANSI).

TIA appreciates the Commission's efforts to reconsider E911 location accuracy requirements and its engagement with APCO, NENA, and only two large carriers, AT&T and Verizon Wireless to craft better requirements. TIA appreciates this Public Notice so that other carriers, vendors, wireless location experts, and industry parties have the opportunity to broaden the dialogue in Comments. The involvement of the entire

industry is necessary to ensure that this effort to address location accuracy produces a better result than previous attempts.

It is clear that, regardless of specific accuracy requirements ultimately adopted by the Commission, efficient and accurate implementation of improved location accuracy requirements will be impossible without the technical expertise of all stakeholders, including wireless network manufacturers, wireless device manufacturers, carriers, and public safety. TIA members are instrumental in developing technologies for wireless networks and wireless devices related to E911 location provision. Such expertise, complementing that of wireless carriers, vendors of location solutions, and public safety entities is essential in guiding compliance with new E911 accuracy standards. As other stakeholders have made clear, an ETAG will enable experts from all key stakeholder groups to work together on the considerable complexities of carrying out the Commission's new E911 accuracy requirements.[1]

TIA thanks the Commission for its consideration of these Comments and looks forward to working with the Commission to develop sound E911 accuracy parameters.

Sincerely,

___/S/_____

Danielle Coffey
Vice President
Government Affairs

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[1] See, e.g., Comments of Motorola, Emergency Services Interconnection Forum, Wireless E911 Location Accuracy Requirements, PS Docket 07-114, *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Association of Public-Safety Communications Officials-International, Inc. Request for Declaratory Ruling, CC Docket No. 94-102, 911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, Notice of Proposed Rulemaking, 22 Rcd 10609 (rel. Jun. 1, 2007) ("NPRM") at 4-6 (filed August 20, 2007); see also Comments of Sprint Nextel Corporation, NPRM, at 3; see also Comments of the 911 Industry Alliance, NPRM, at 2; see also Comments of the Emergency Services Interconnection Forum, NPRM, at 4-5.