

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Wireless E911 Location Accuracy) PS Docket No. 07-114
Requirements)

COMMENTS OF WIRELESSWERX

WirelessWERX, a provider of precise location determination for wireless calls made from indoors or underground, submits these comments for the singular purpose of supporting the pledges of NENA, APCO and several wireless carriers – including Verizon Wireless, AT&T and T-Mobile – to convene

a working group of public safety and wireless carriers, vendors and other experts . . . to develop the specifics of indoor testing.¹

WirelessWERX takes no position, at this time, on the proposed use of the county as the jurisdiction over which to measure compliance with wireless location accuracy standards ranging from 50 to 300 meters. However, once testing protocols are established to include indoor points commensurate with increasing numbers of calls originating in buildings, parking garages and campus environments, we are confident that the results achievable with our SiteWERX solution will improve the averages of either assisted GPS or terrestrial network triangulation methods.

SiteWERX does not depend on such triangulation methods. The solution is based on Bluetooth-enabled location nodes deployed throughout a chosen location environment. If cell phones or other hand-held communications devices are also Bluetooth-enabled and have access to

¹ Public Notice, DA 08-2129, released September 22, 2008, Appendix A, letter of July 14, 2008 from Willis Carter of APCO and Ronald Bonneau of NENA to Chief Derek Poarch of the FCC's :Public Safety and Homeland Security Bureau.

necessary device software, the SiteWerx solution uses a Selection Algorithm to pinpoint call locations within 10 meters 97 per cent of the time.²

WirelessWerx holds or has the use of three patents and seven more patent applications are pending. WirelessWerx is willing to license these proprietary interests on a fair and reasonable basis to parties wishing to use them for locating emergency callers or other legitimate public safety purposes.

We intend to participate in the recommended working group “to develop the specifics of indoor testing,” and we look forward to assisting public safety, the wireless carriers and the FCC in assuring that emergency calls from structures can be pinpointed vertically as well as laterally to reduce search times and better protect lives and property.

Respectfully submitted,

WIRELESSWERX

By _____

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² Ex parte communications of June 3, July 14 and October 1, 2008, in Dockets 07-114, 05-196 and 94-102. We expect these results of limited testing at a university engineering building to be further validated, and likely improved, in current experiments at a large corporate campus in Colorado. Test results and deployment cost data will be placed in all three dockets as available.’