

National Emergency Number Association  
*The Voice of 9-1-1*



December 11, 2008

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

Re: Wireless E9-1-1 Location Accuracy Requirements; PS Docket 07-114

Dear Ms. Dortch :

Pursuant to Section 1.1206(b) of the Commission's rules, this is to inform the Commission that on December 10, 2008 the undersigned met with Commissioner McDowell and Angela Giancarlo, Chief of Staff and Senior Legal Advisor for Commissioner McDowell. During the meeting, I reiterated NENA's full support for the proposals we put forward with the Association of Public-Safety Communications Officials International ("APCO"), AT&T Mobility and Verizon Wireless to measure wireless E9-1-1 location accuracy requirements at the county level.

Also discussed were the challenges faced by rural carriers in meeting E9-1-1 location accuracy requirements. Rural carriers have challenging geographic areas, including many sparsely populated areas with few cell towers. While NENA expects rural carriers to provide effective E9-1-1 service to its customers and to meet FCC rules, it is appropriate for the Commission to examine the unique issues faced by rural carriers in greater detail. I indicated NENA's belief that it would be appropriate for the Commission to issue a Further Notice of Proposed Rulemaking (FNPRM) with a brief comment and reply comment period specifically designed to address E9-1-1 issues facing rural carriers. This should, however, not delay FCC action for rules concerning Tier One and Tier Two carriers.

With respect to T-Mobile, I suggested that the FCC should reach some accommodation recognizing the situation T-Mobile finds itself in concerning access to AWS spectrum for their 3G network, the network used for deploying A-GPS handsets. If the Commission does provide some accommodation for T-Mobile, then the carrier should have reporting requirements imposed that allow public safety to review their progress on both the deployment of their 3G network and the percent of handsets sold with A-GPS chips.

Finally, I reiterated NENA's strong support for the creation of an E9-1-1 Technology Advisory Group (ETAG) where industry and public safety, with FCC oversight, can work constructively on addressing unresolved issues, such as in-building testing, performance of emerging location technologies, and next generation 9-1-1.

Please direct any questions to the undersigned.

Sincerely,

Brian Fontes  
CEO