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BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

**Re: *Ex Parte* Presentation of Polaris Wireless, Inc.
PS Docket No. 07-114 and CC Docket No. 94-102**

Dear Ms. Dortch:

On August 27, 2009, Polaris Wireless, Inc. (“Polaris”) Chief Technology Officer Martin Feuerstein along with the undersigned, counsel to Polaris, met with James Barnett, David Furth, Jeff Cohen, Bill Lane, and Erika Olsen of the FCC’s Public Safety and Homeland Security Bureau regarding the above-referenced proceeding. The Polaris representatives, joined by Polaris CEO Manlio Allegra, also met separately on August 28 with Erin McGrath, legal advisor to Commissioner Meredith Baker; and David Goldman, acting legal advisor to Chairman Julius Genachowski. During the meetings, Polaris responded to questions about its Wireless Location Signatures (“WLS”) and hybrid technology and distributed the attached presentation regarding recent location accuracy test results for urban and indoor environments.

Pursuant to Section 1.1206(b) of the Commission’s rules, I am filing this notice electronically in the above-referenced dockets. Please contact me directly with any questions.

Respectfully Submitted,

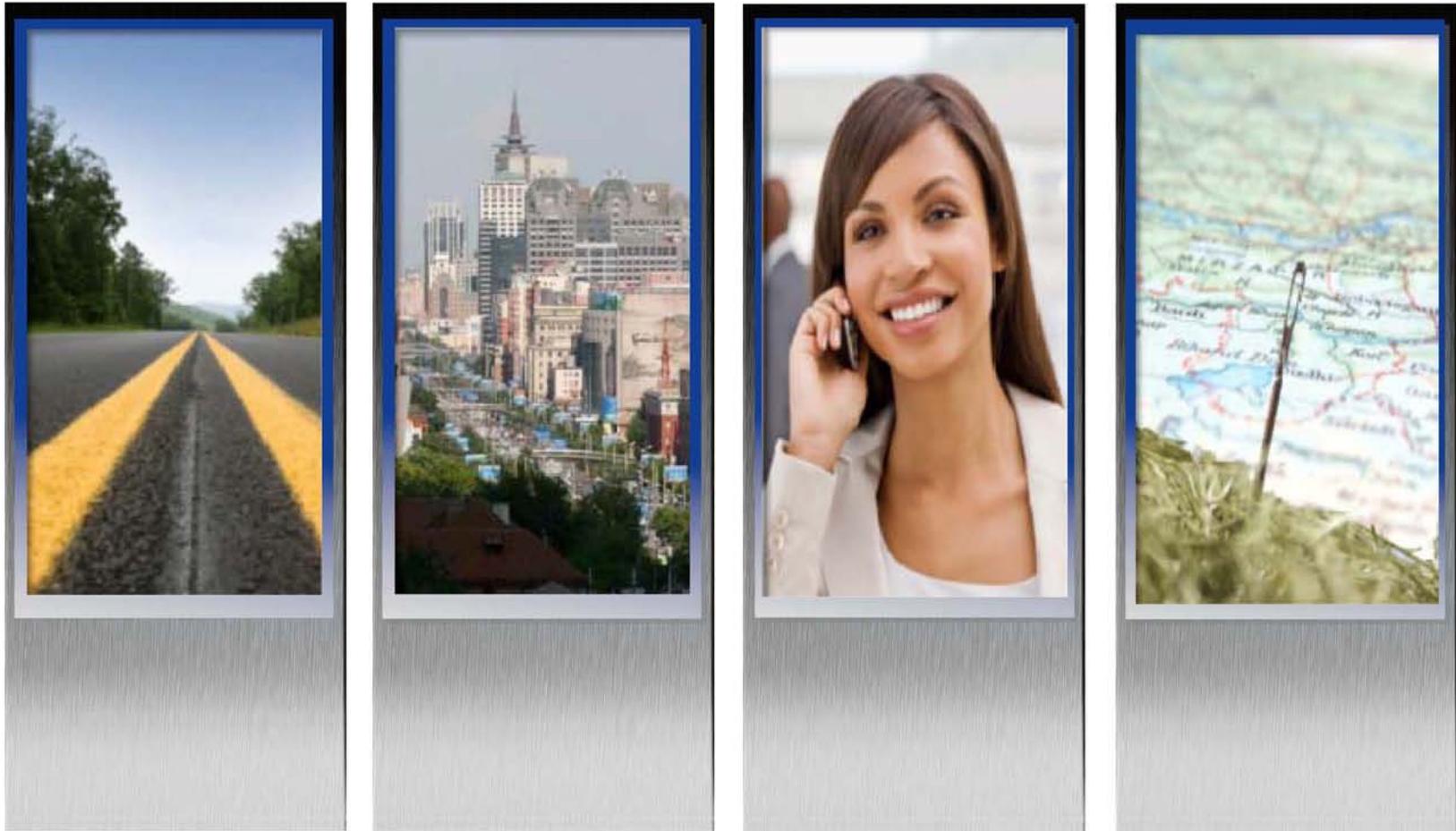
/s/ Michele C. Farquhar

Michele C. Farquhar
Counsel to Polaris Wireless, Inc.

Ms. Marlene H. Dortch
August 28, 2009
Page 2

Enclosures

cc: James Barnett
David Furth
Jeff Cohen
Bill Lane
Erika Olsen
Erin McGrath
David Goldman



The Power of Signatures

Global Leader for High Accuracy Wireless Location Systems

Introduction – Who is Polaris Wireless?



Polaris Wireless is the global leader in providing high accuracy, software-based, location systems to wireless operators, law enforcement agencies and application companies

About Polaris



Founded in 1999

Venture funded – DFJ, Palisades Ventures and ePlanet Ventures

HQ in Santa Clara, CA. Satellite offices in:

Seattle, WA

Washington, D.C.

Santiago, Chile

Boston, MA

Tokyo, Japan

Bangalore, India

45 patents filed, 18 granted

Highly experienced management team

Customers: Wireless operators in the US and Government Agencies in APAC

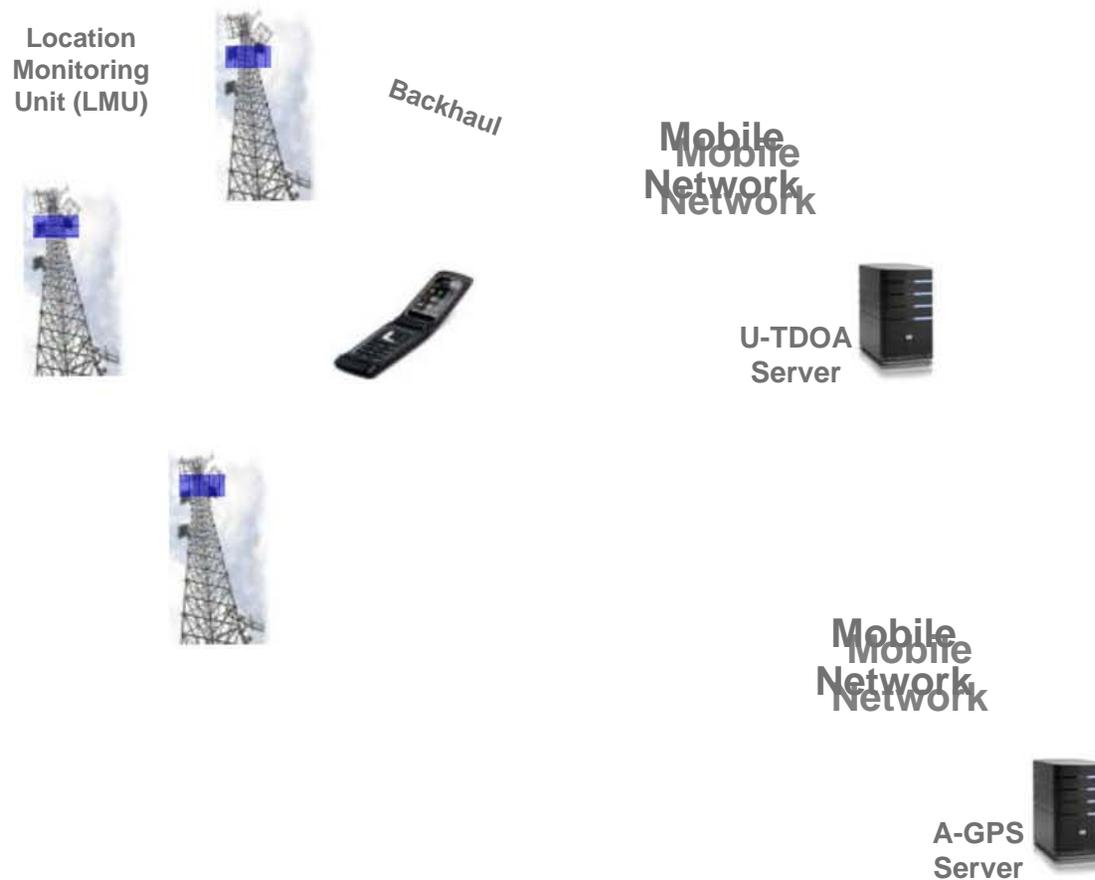
Polaris WLS Solution



Polaris WLS → A software-only solution

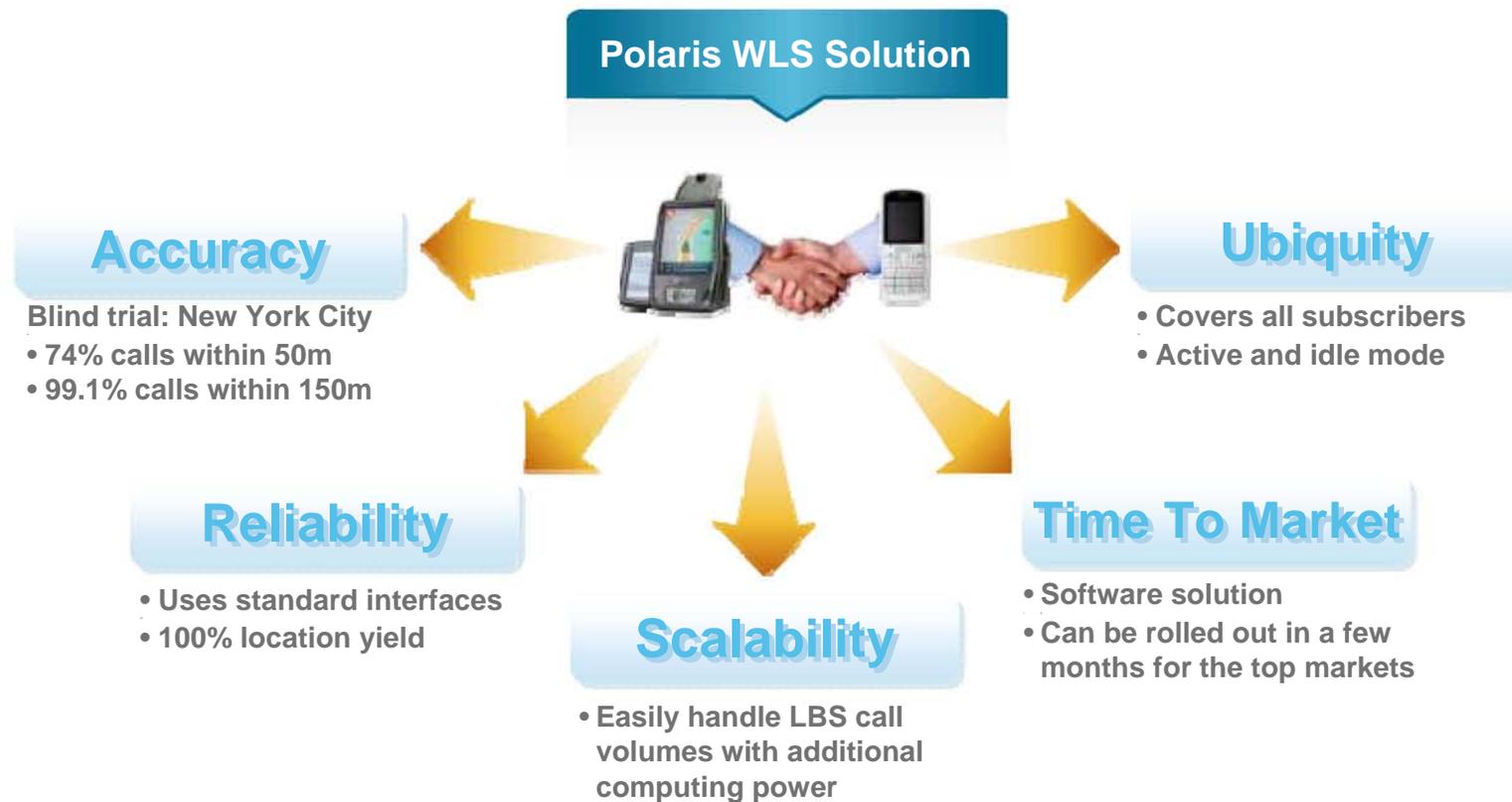
Competing Location Solutions

Triangulation (U-TDOA)



Assisted-GPS

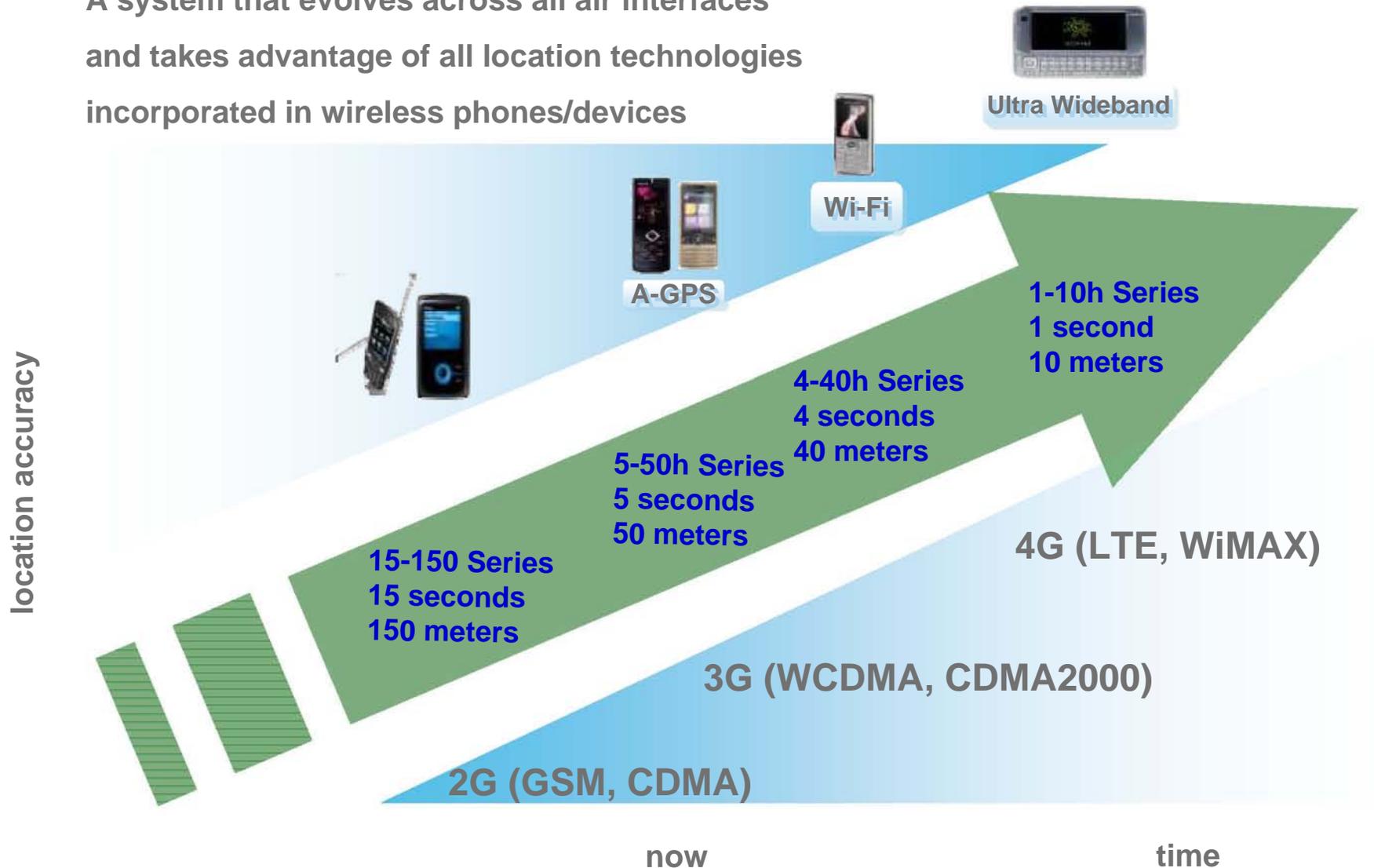
WLS Core Benefits



Polaris's proven track record → a valuable long-term partnership

The Polaris Vision

A system that evolves across all air interfaces and takes advantage of all location technologies incorporated in wireless phones/devices



Wireless Location Signatures (WLS)



- Signatures based on standard radio network measurements (signal strengths, time delays, etc.)
- Pattern match against a prediction database to estimate location



- **WLS supported in UMTS, GSM, CDMA2000 – No handset change-outs**
- **Software-only approach – No radio hardware network overlay, no GPS chip**

WLS Performance Overview

New York City



WLS Urban Accuracy iDEN

<50m, 74% of cases
<150m, 99% of cases

Toronto



WLS Urban Accuracy UMTS

<50m, 69% of cases
<150m, 96% of cases

Tokyo



WLS Indoor Accuracy UMTS

<60m, 67% of cases
5 second fix time

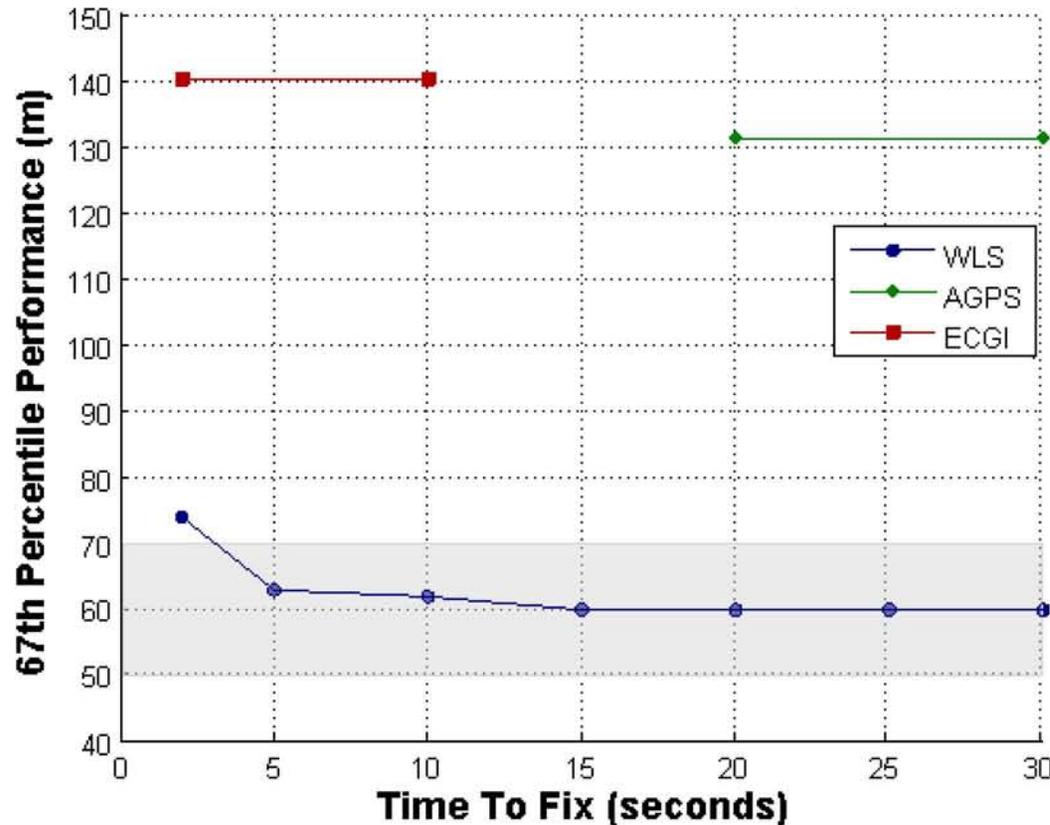
San Francisco



WLS Urban Accuracy GSM

<44m, 67% of cases
<135m, 95% of cases

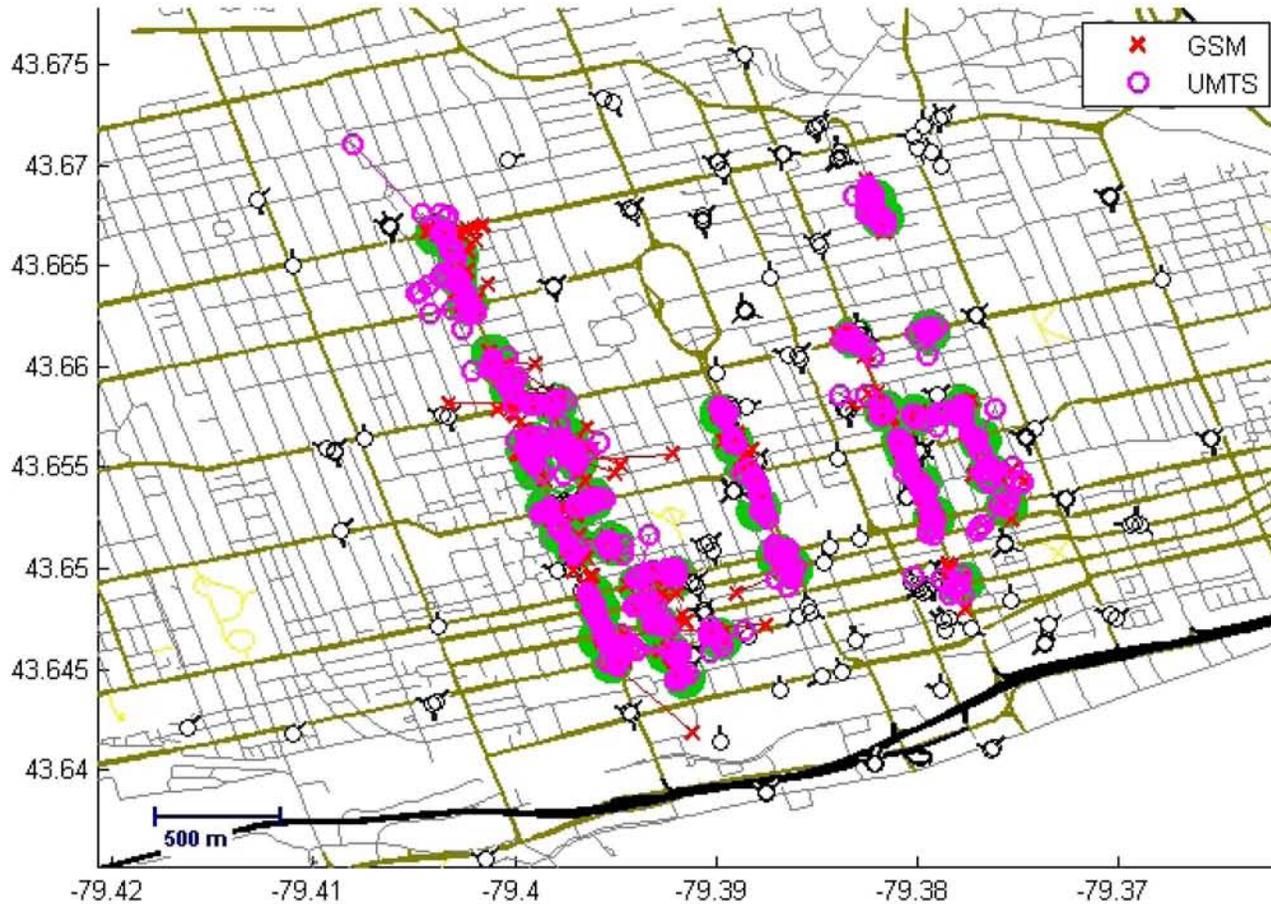
Urban Indoor Performance vs. Alternatives



- Indoor test points in Tokyo urban area
- Shaded area is the desired accuracy
- A-GPS performance marked in **Green**
- ECGI (Enhanced Cell Global Identity) marked in **Red**
- WLS performance indicated in **Blue** for different time-to-fix with 100% location yield

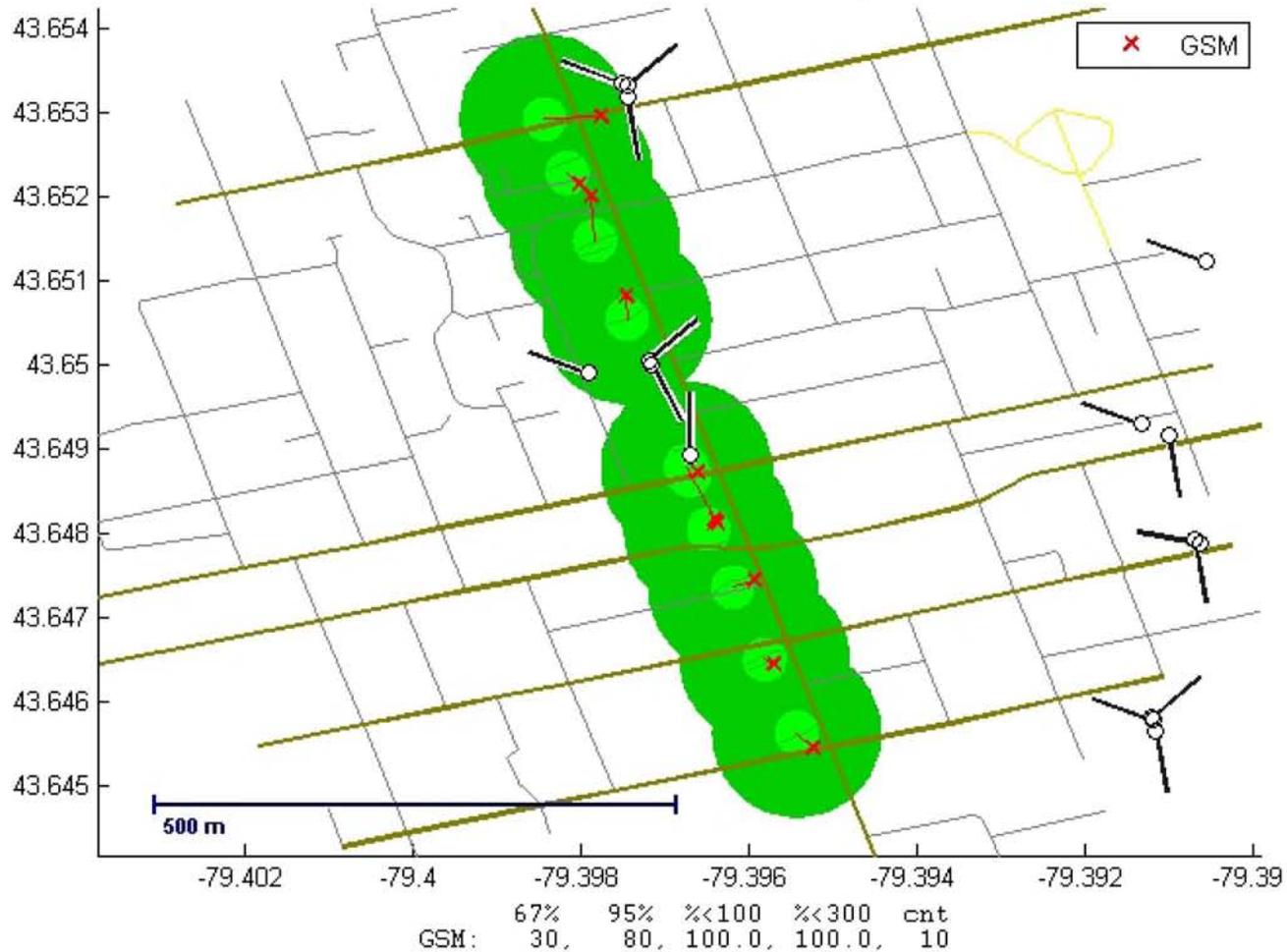
WLS Achieves High Accuracy in Short Time to Fix

Example Stationary Points

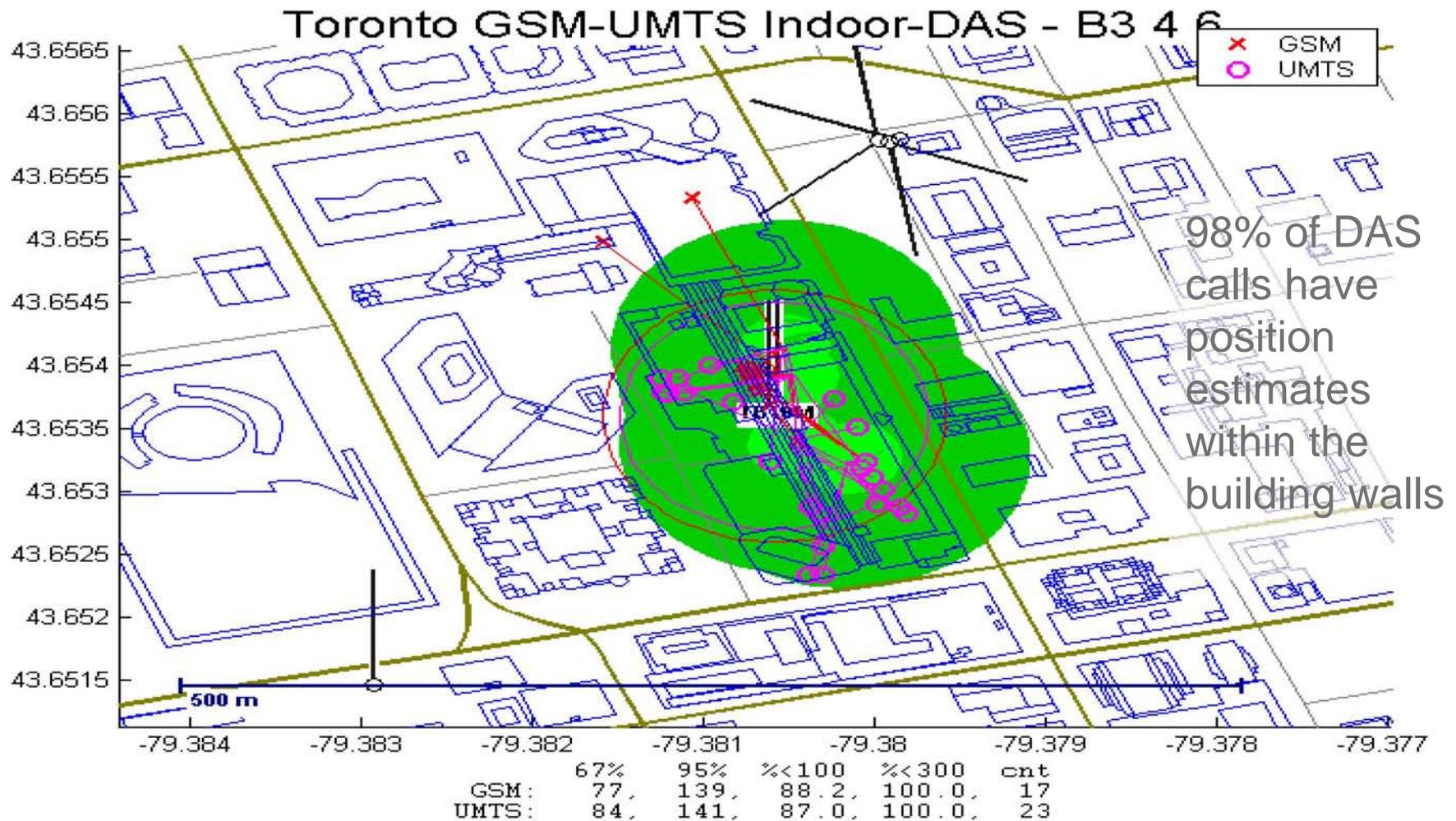


	67%	95%	%<100	%<300	cnt
GSM:	56,	170,	84.6,	98.7,	531
UMTS:	48,	140,	90.2,	99.8,	591

Example Pedestrian Route

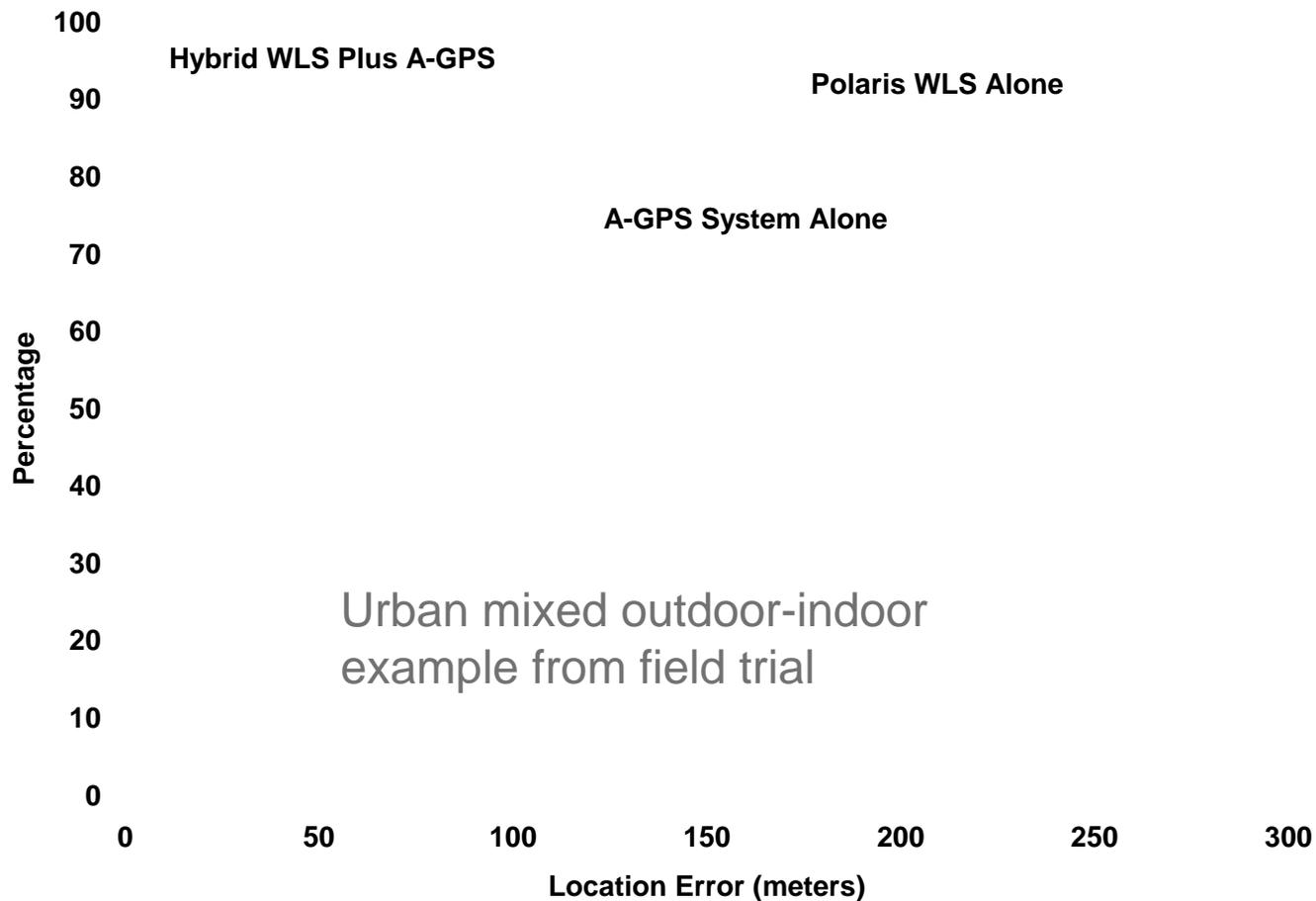


Example Indoor Building



Urban UMTS Results: WLS vs. AGPS System (AGPS/AFLT) vs. Hybrid

A-GPS has large error tails that WLS does not have



Conclusions

- Future E911 Phase II solutions require hybrid approaches blending handset- and network-based systems
- Urban and indoor performance is critically important and requires solutions like Wireless Location Signatures in these challenging environments