

**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 NENA

The National Emergency Number Association (“NENA”) hereby comments on the Commission’s *Public Notice*, DA 09-2397, released November 6, 2009, in the above-captioned proceeding. We appreciate that the Commission is addressing the issue and urge all parties to come together to agree upon reasonable requirements applicable industry-wide.

NENA continues to support the county-level compliance approach, with reasonable exceptions, that we supported over a year ago along with the Association of Public Safety Communications Officials (“APCO”) International, AT&T, and Verizon Wireless.¹ We are interested in hearing from those carriers who did not support the proposal last year to determine if the same concerns remain a year later. We also look forward to hearing from other parties to determine if any technological advancements have been made that might augment the ability to comply with our earlier proposals.

¹ Letter from NENA, APCO, and Verizon Wireless to Kevin J. Martin, Chairman, PS Docket No. 07-114 (Aug. 20, 2008); Letter from NENA, APCO, and AT&T to Kevin J. Martin, Chairman, PS Docket No. 07-114 (Aug. 25, 2008).

Additionally, as the Commission considers a final rule for location accuracy compliance, we urge the Commission to also remain aware of the need to ensure that all Public Safety Answering Points (“PSAPs”) are capable of receiving Phase II wireless E9-1-1 data. Significant progress has been made on this issue since NENA and others submitted their proposals over a year ago.² However, there are still over 350 PSAPs that are not Phase II-capable. While a state and local issue, the Commission can play a leadership role by working with NENA, APCO and others on outreach to ensure these PSAPs take the steps necessary to receive wireless location information.

Respectfully submitted,

NENA

By _____

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November 20, 2009

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² In August of 2008, 86% of PSAP were capable of receiving Phase II location information (representing counties covering 93% of the US population). In November of 2009, 94% of PSAPs are capable of receiving Phase II location information (representing counties covering 96% of the US population).