

E911 Technical Advisory Group (“ETAG”) that will, within one year, make recommendations regarding potential improvements in both location accuracy and the manner in which such accuracy is measured. Third, the parties propose that CMRS carriers provide “confidence and uncertainty” data that PSAPs can use to assess the degree of confidence the carrier has in the location data it has provided to the PSAP. Each of these proposals should be adopted.

Public safety organizations have long proposed that, in addition to system-wide performance, carriers be required to meet location accuracy requirements within specific geographic areas. The APCO/NENA/AT&T joint proposal would introduce county-level location accuracy standards and compliance benchmarks, while recognizing that “network-based providers will be unable to meet the new proposed county-level accuracy standards in all areas relying solely upon current network-based technology solutions.” The specific accuracy standards in this joint proposal, along with interim compliance benchmarks, are set forth in detail in the Joint Letter, and AT&T will not repeat them here.

It is important to stress that these standards and benchmarks are aggressive. Indeed, as the Joint Letter recognizes, they cannot be met solely in reliance on technology that is available today. Their purpose is to ensure that carriers continue to work aggressively to improve location accuracy, and they reflect an optimistic assessment of the speed with which carriers will be able to develop and deploy new technologies to achieve that goal. The Joint Letter is discussed in further detail in AT&T’s initial comments in this matter.³ AT&T submits that there have been no subsequent developments that would counsel against the adoption of the proposals in the Joint Letter.⁴

³ See, Comments of AT&T (Oct. 6, 2008); Reply Comments of AT&T (Oct. 14, 2008).

⁴ Consistent with the proposals contained in the Joint Letter, AT&T plans to utilize network-based and handset-based technologies in its networks, as appropriate, to meet the proposed E911 accuracy standards.

Conclusion

The proposals reflected in the Joint Letter continue to reflect AT&T's commitment to improvements in wireless E911 location accuracy. AT&T respectfully suggests that those proposals should be adopted.

Respectfully submitted,

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November 20, 2009