

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Request to Refresh the Record Regarding)	PS Docket No. 07-114
Service Rules for Wireless Enhanced 911)	
Phase II Location Accuracy and Reliability)	
)	
Wireless E911 Location Accuracy)	
Requirements)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911)	
Emergency Calling Systems)	

REPLY COMMENTS OF EMFINDERS, INC.

EmFinders, Inc.¹ submits this reply to the comments filed in response to the Public Notice (*Public Notice*) addressing the Commission's rules relating to the location accuracy of wireless devices.² These rules are the underpinning of locating individuals confronted with an emergency, including persons who are impaired or become disoriented and must be found quickly.

EmFinders,TM is a technology company dedicated to the rapid location and recovery of wandering or missing adults and children. Its product line consists of an affordable wearable device and activation service which are linked to 911 emergency response systems. It takes advantage of existing network based cellular telephone location technology.

¹ EmFinders is based in Frisco, Texas. TruePosition, Inc. has an investment interest in EmFinders.

² See *Public Notice*, Public Safety and Homeland Security Bureau Seeks to Refresh the Record Regarding Service Rules for Wireless Enhanced 911 Phase II Location Accuracy and Reliability, PS Docket No. 07-114 (rel. Nov. 6, 2009).

The EmFinders EmSeeQ is a small, watch-like, wireless device without buttons or a screen and is under the secure and remote control of the EmFinders operations center. It is worn by individuals with medical impairments like Autism, Down syndrome or Alzheimer's disease. The device can only be activated at the request of the caregiver. It will only call 911 after a caregiver has reported the individual missing to the police. A call from the EmFinders device is a pre-screened 911 call.

The comments in this proceeding present views regarding particular technologies and the varying in several environments where devices are to be located. EmFinders thinks that the Commission's priority should be directed to areas where most 911 calls are made. Our particular focus are urban and suburban population centers where our services are relied upon to locate wandering or disoriented individuals.

The EmFinders solution uses network based Uplink Time Difference of Arrival (U-TDOA) technology. U-TDOA technology provides accurate location estimates for the environments where missing persons are most likely. These include urban and suburban neighborhoods, particularly inside buildings, shopping malls and parking garages. Wandering or disoriented individuals tend to seek shelter in such areas. EmFinders believes it critical that the Commission embrace indoor accuracy standards that are subject to testing and compliance procedures.

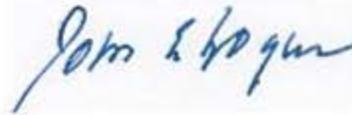
In contrast to U-TDOA, A-GPS technology encounters severe challenges in urban and suburban areas. Concrete, steel and glass structures, as well as skyscrapers obstruct and degrade A-GPS location accuracy. The EmFinders system does not use A-GPS for this reason. Simply put, EmFinders could not provide the life-saving services it currently provides if it had to rely solely on A-GPS technology.

EmFinders' technology was developed to provide a critical yet cost efficient service to locate quickly a fragile and challenged population. It is based on the Commission's own commitment to improve emergency response through technology- the ability to locate wireless devices at increasing levels of accuracy. We urge the Commission to continue its vital work to bring all segments of the American public the full benefits of wireless technology.

Respectfully submitted,

EmFinders, Inc.

Frederic Beckley
General Counsel

A handwritten signature in blue ink, appearing to read "John E. Logan", is written over a light blue rectangular background.

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