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September 10, 2010

**Ex Parte**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

*Re: Wireless E911 Location Accuracy Requirements – Docket 07-114*

Dear Ms. Dortch:

On September 9, 2010, Robert W. Quinn, Jr. (Senior Vice President Federal Regulatory and Chief Privacy Officer) and I, on behalf of AT&T Services, Inc., met with Louis Peraertz, Acting Legal Advisor-Wireless, International and Public Safety/Office for Commissioner Mignon Cyburn. During the meeting, we expressed AT&T's support for the E911 County Level Accuracy Order scheduled for vote at the September 23 Commission Meeting to the extent that it is consistent with the original proposal submitted by AT&T, NENA and APCO as summarized in the Attachment to this ex parte.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket. If you require any additional information, please feel free to contact me.

Sincerely,

/s/ Joseph P. Marx  
Assistant Vice President, AT&T Services Inc.

cc: Louis Peraertz

## County Level Accuracy Order

Carriers are currently required to meet accuracy requirements at a nationwide level using either a network based solution (100/300m) or a handset based solution (50/150m) at the 67<sup>th</sup> percentile and 95<sup>th</sup> percentile

Updated Accuracy Order is based on a proposal from AT&T, NENA, and APCO that would require carriers meet existing accuracy requirements at the County Level at the 67<sup>th</sup> percentile and 90<sup>th</sup> percentile

### County Level benchmarks

#### 67<sup>th</sup> Percentile (100m) Accuracy

**End of Year 1:** Carriers shall comply in 60% of counties, which counties shall cover at least 70% of the POPs covered by the carrier, network-wide.

**End of Year 3:** Carriers shall comply in 70% of counties, which counties shall cover at least 80% of the POPs covered by the carrier, network-wide.

**End of Year 5:** Carriers shall comply in 100% of counties.

#### 90<sup>th</sup> Percentile (300m) Accuracy

**End of Year 3:** Carriers shall comply in 60% of counties, which counties shall cover at least 70% of the POPs covered by the carrier, network-wide.

**End of Year 5:** Carriers shall comply in 70% of counties, which counties shall cover at least 80% of the POPs covered by the carrier, network-wide.

**End of Year 8:** Carriers shall comply in 85% of counties.

Carriers may elect to use a 1) network based accuracy data; 2) blended accuracy data (network/handset); 3) handset accuracy data (subject to the handset accuracy numbers) provided they meet a specific penetration rate or offer of free handset within the county