

April 21, 2010

BY ELECTRONIC FILING

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

**Re: *Ex Parte* Presentations of Polaris Wireless, Inc.
PS Docket No. 07-114 and WC Docket No. 05-196**

Dear Ms. Dortch:

Yesterday, Norman Shaw, Executive Director, Technical Standards and Business Development, Polaris Wireless, Inc. ("Polaris"), and the undersigned met with Amy Levine, Special Counsel to FCC Chairman Genachowski and with David Furth, Erika Olsen, Patrick Donovan, Tim May, David Siehl, and Henning Schulzrinne of the FCC's Public Safety and Homeland Security Bureau.

During the meetings, the Polaris representatives addressed the wireless E911 location accuracy issues raised in the attached presentation. In addition, they noted the comments and reply comments filed by Polaris on the *Further Notice of Proposed Rulemaking* ("FNPRM") in the above-captioned proceeding, including on the issues of encouraging the use of hybrid technologies; moving toward a uniform testing methodology and test intervals; improving location accuracy indoors and in the vertical dimension; and supporting the use of E911 technical advisory groups or committees to assist with the issues identified in the FNPRM.

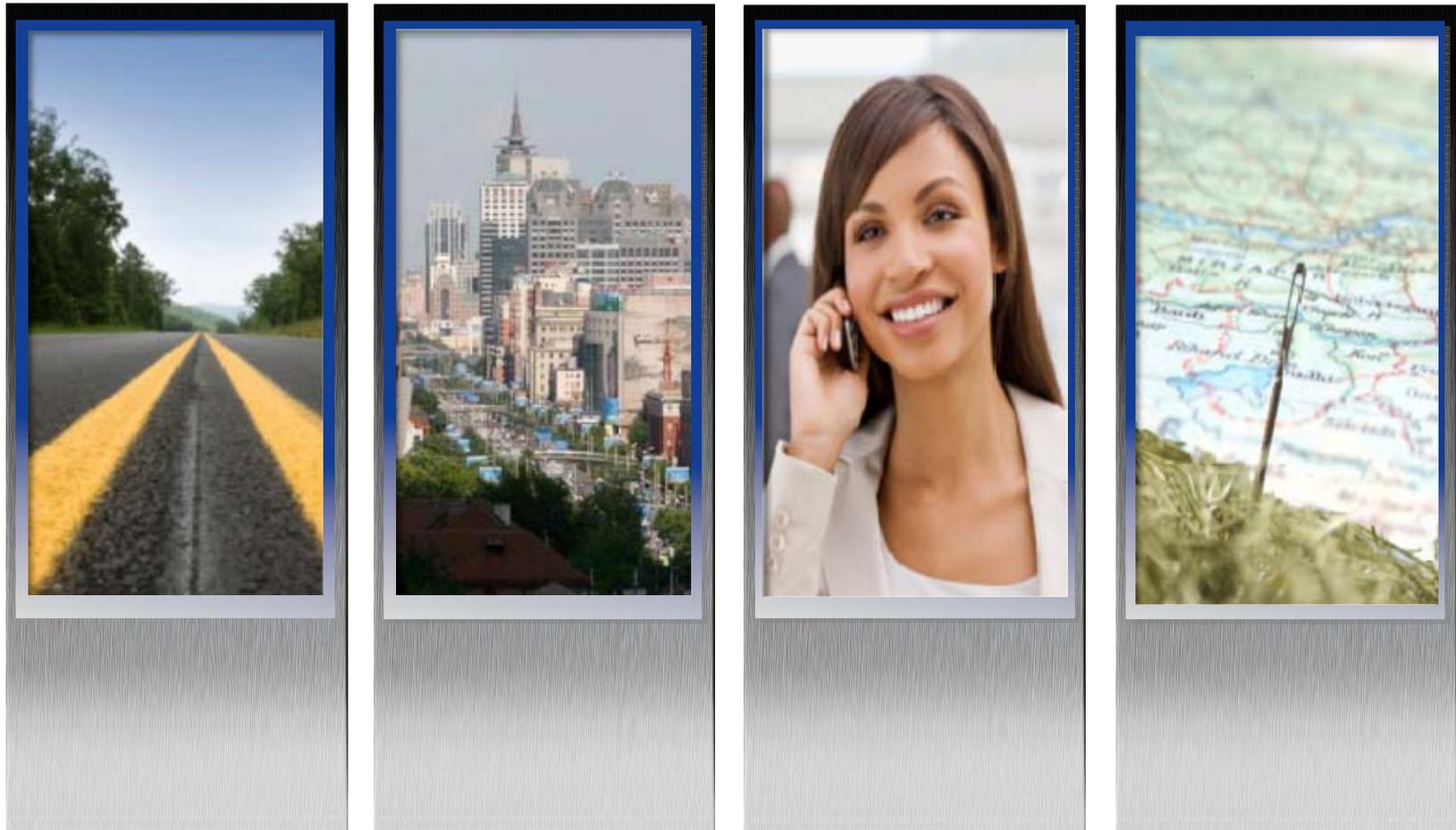
Pursuant to Section 1.1206(b)(2) of the Commission's rules, I am filing this notice electronically in the above-referenced dockets. Please contact me directly with any questions.

Respectfully Submitted,

/s/ Michele C. Farquhar

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cc: Amy Levine
David Furth
Erika Olsen
Patrick Donovan
Tim May
David Siehl
Henning Schulzrinne



The Power of Signatures

Global Leader for High Accuracy Wireless Location Solutions

Polaris Wireless: Introduction



Polaris Wireless is the global leader in providing **high accuracy, software-based, location solutions** to wireless operators, intelligence and law enforcement agencies

~~Hardware on cell sites~~

~~Hardware or software changes in the mobile device~~

Corporate Update



Customers

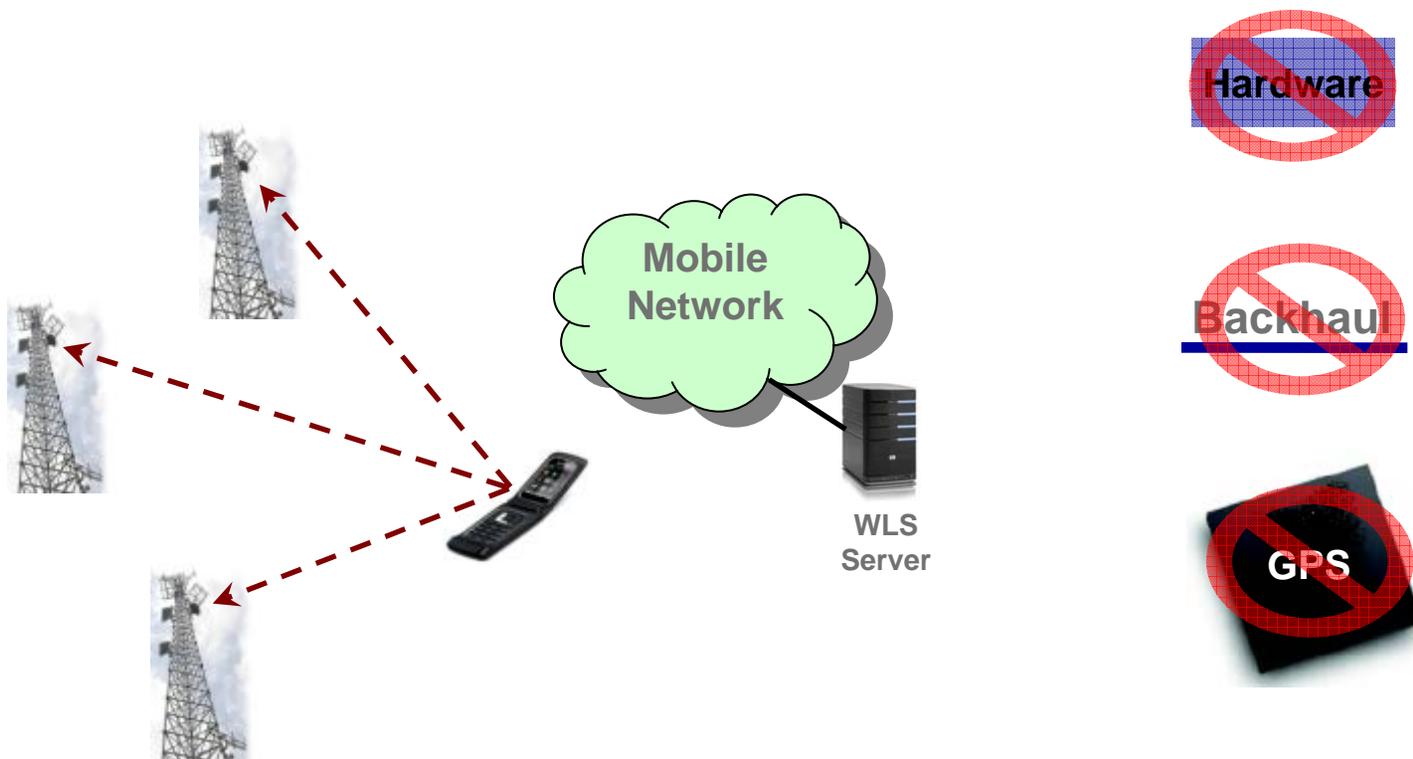
US (24 Operators), APAC (3G), EMEA (2G/3G)

- Over 10 years in Industry with Location Technology as core focus
- Emergency Services Customers: 24 US operators
- Government Customers: Law Enforcement Agencies in US, APAC & EMEA
- Highly experienced R&D, management team
- IPR - 50 patents filed, 20 granted
- Headquarters in Mountain View, California
- Satellite offices around the world



<http://www.polariswireless.com>

Polaris Wireless Location Signatures (WLS)



Polaris WLS → A software-only solution

Wireless Location Signatures (WLS)

- WLS compares a Signature from the handset against the PSD
- Calculates best pattern match to determine handset location



- **WLS is fully supported in GSM and UMTS -- No handset changes**
- **Software-only solution**

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

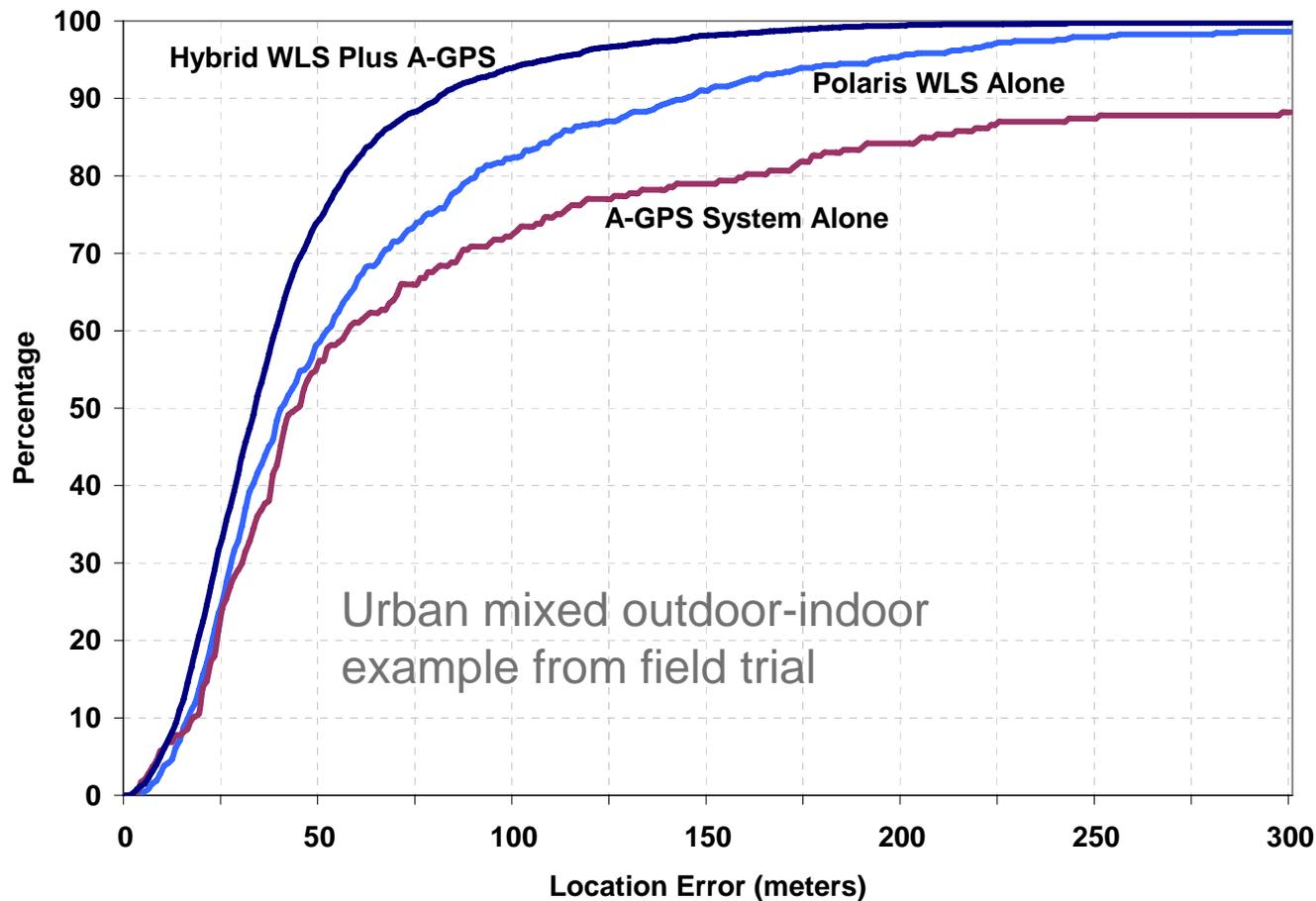
San Francisco



**WLS Urban Accuracy
GSM**
<44m, 67% of cases
<135m, 95% of cases

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

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





Thank You!