



May 18, 2011

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

Re: In the Matter of Wireless E911 Location Accuracy Requirements, PS Docket No 07-114 and E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

On May 16, 2011, a number of Cisco technical staff participated in a meeting on the above captioned dockets with staff from the Public Safety and Homeland Security Bureau. Participating from Cisco were: Ed Haynes, Allen Huatori, Dave Viraq, Tom Kintner, Diego Gastaldi, Bill Wall and myself. Participating from the FCC were: Patrick Donovan, Henning Schulzrinne, David Siehl, Stan Scheiner, John Healy and Jerry Stanshine. The meeting took place via Cisco Telepresence and Webex.

The meeting occurred at the request of FCC staff, and covered Cisco's understanding of whether location identification information that was either known or discoverable by devices in the home could help verify and improve location accuracy or provide location in cases where no location information exists today.

Cisco described how its Femto cell technology verifies location information when the device is booted up, as well as subsequently. The device uses both GPS capability as well as the ability to analyze its RF environment upon subsequent start ups. Not all internal placements of the device yield accurate information, however. If the operator allows it, the device can also accept location information from the mobile phone.

In response to an FCC question, Cisco said that while it is technically possible to make location information available to other devices in the home, customers have not requested that capability be implemented. Cisco explained that in the context of consumer devices, such as access points, there would be many ways to distribute location information to devices that lack location awareness, but that industry would be looking for a single, consistent standards-based way to deliver that location information, and for a standards-based method that was simple to implement. Cisco also stated that even if location information can be exposed to other devices, those devices still need an API in order to enable the device to take advantage of the information

that it is being given. By comparison, on enterprise access point networks today, Cisco distributes location information to end devices and can supply those networks with a location server that can be used to locate devices and assets. That capability on enterprise networks is enabled by system mapping, and the ability to triangulate signals on enterprise networks, something not possible on single access point residential networks.

Cisco also discussed differences between DSL networks, where location is known at the DSLAM, and cable networks, which are more location challenged since they are not point to point architecture. Cisco staff also discussed the need to bridge capabilities from the network operator, hardware vendors, and OS vendors in order to improve upon location information. Finally, Cisco stated that to the extent the FCC is thinking about new requirements, it is imperative that they be as clear as possible about the bounds of the new requirements in order to provide guidance to developers about what capabilities will be needed.

Respectfully submitted,

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