

Catherine Wang  
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July 26, 2011

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, DC 20554

Re: **ERRATUM** - Notice of *Ex Parte* Meeting – GN Docket No. 11-117, PS Docket No. 07-114 and WC Docket No. 05-196

Dear Ms. Dortch:

This filing serves to correct an error within the Notice of *Ex Parte* Meeting filed with the Commission on July 25, 2011 on behalf of CommScope, Inc. (“CommScope”), in the above referenced proceedings.

Specifically, the transmittal referenced June 25, 2011 in lieu of July 25, 2011 and the notice referenced that the *ex parte* meeting was held on June 21, 2011. The meeting in fact occurred on July 21, 2011.

Attached herewith is a corrected copy of the Notice of *Ex Parte* Meeting.

Should any additional information be required with respect to this *ex parte* notice, please do not hesitate to contact the undersigned.

Very truly yours,

/s/

Catherine Wang

Attachment  
cc (by email): FCC Representatives

Boston  
Hartford  
Hong Kong  
London  
Los Angeles  
New York  
Orange County  
San Francisco  
Santa Monica  
Silicon Valley  
Tokyo  
Walnut Creek  
Washington

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2020 K Street NW  
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July 25, 2011

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445 12th Street, S.W.  
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Re: Notice of *Ex Parte* Meeting – GN Docket No. 11-117, PS Docket No. 07-114  
and WC Docket No. 05-196

Dear Ms. Dortch:

On behalf of CommScope, Inc. (“CommScope”) and pursuant to Section 1.1206 of the Commission’s Rules, 47 C.F.R. § 1.1206, this letter provides notice of an *ex parte* meeting held on July 21, 2011, in connection with GN Docket No. 11-117, PS Docket No. 07-114 and WC Docket No. 05-196. The meeting was attended by Mr. Andrew Beck, Director - Product Development and Mr. George Marble, Director-Business Development both at CommScope (the “CommScope Representatives”) as well as the following staff from the Public Safety and Homeland Security Bureau (the “FCC Representatives”): Patrick Donovan, Attorney Advisor; David Furth, Deputy Bureau Chief; John Healy, Engineer; Tim May, Analyst; David Siehl, Attorney Advisor; Jerome Stanshine, Engineer; and, via conference call, Erika Olsen, Attorney Advisor and Henning Schulzrinne, Engineering Fellow. The undersigned attended as outside counsel to CommScope.

The purpose of the meeting was to discuss emergency caller location technology issues. In particular, we discussed developments in indoor location technologies and practical considerations in deployment of indoor systems, CommScope’s extensive experience in E911 location Phase II accuracy testing, as well as practical and technology issues in VoIP autolocation. The CommScope representatives presented the attached slides.

Should any additional information be required with respect to this *ex parte* notice, please do not hesitate to contact the undersigned.

Very truly yours,

/s/

Catherine Wang

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# COMMSCOPE®

## E911 Phase II Caller Location

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July 21, 2011

connect+evolve

## CommScope Profile

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- **Worldwide manufacturer and vendor of infrastructure that connects the world and evolves with every advance in technology**
  - Radio Frequency solutions for wireless networks
  - Optical and RF solutions for broadband networks
  - Wired and wireless solutions for enterprise networks
- **Wireless E911 Caller Location Support for More Than a Decade**
  - “Handset-based”, “network-based”, “hybrid” location technologies
  - Multi-network/multi-vendor platforms to support all networks
  - Leading carrier customer base
  - Indoor Solution

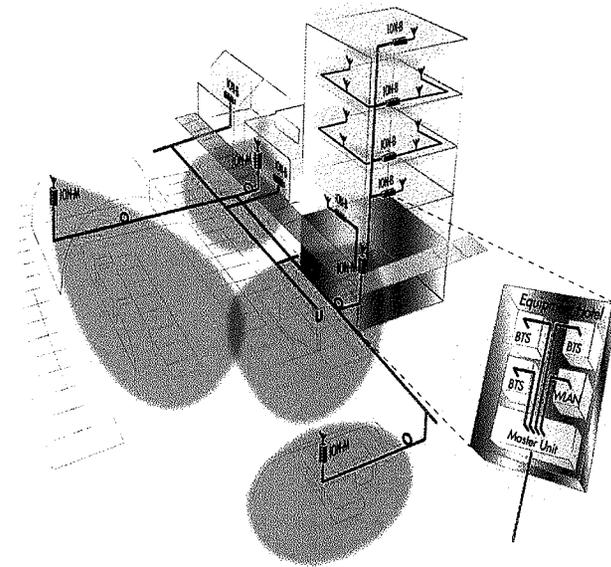
## Discussion Topics

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- Indoor Location
- E911 Phase II Accuracy Testing
- VoIP Autolocation

## CommScope Indoor Location System

- Announced April 2011
- Deploy with DAS or as stand-alone
- Proximity detection method
- High accuracy and yield
- Works in concert with existing macro caller location systems
- No handset modification
- 2G and 3G, 4G planned



## Indoor Location Considerations

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*(A) Is the objective to improve x-y location within structures?*

*(B) Is the objective to produce x-y-z locations within structures?*

- Accomplishing A may not necessarily accomplish B
- Accomplishing B should also accomplish A
  
- Performance improvement for current E911 regulation:
  - Meet E911 accuracy objectives within structures
  - Improve yield of high-accuracy locations when A-GPS is the primary method
  
- CommScope's indoor solution can accomplish A and B
  - Augments location within structures and can provide a vertical component

# Indoor Testing Considerations

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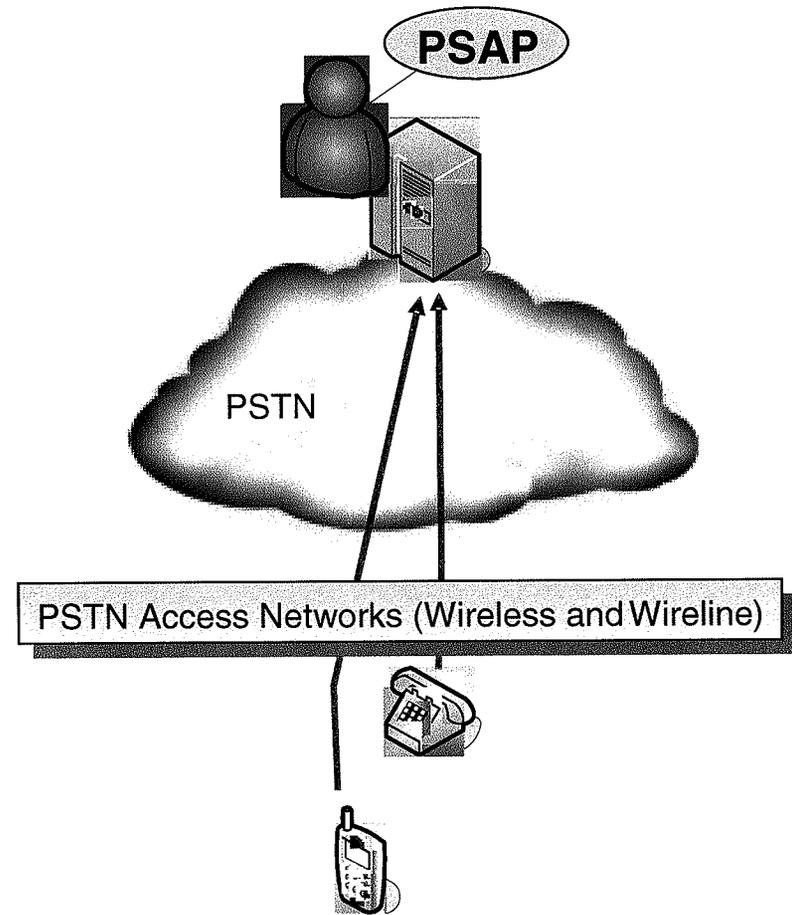
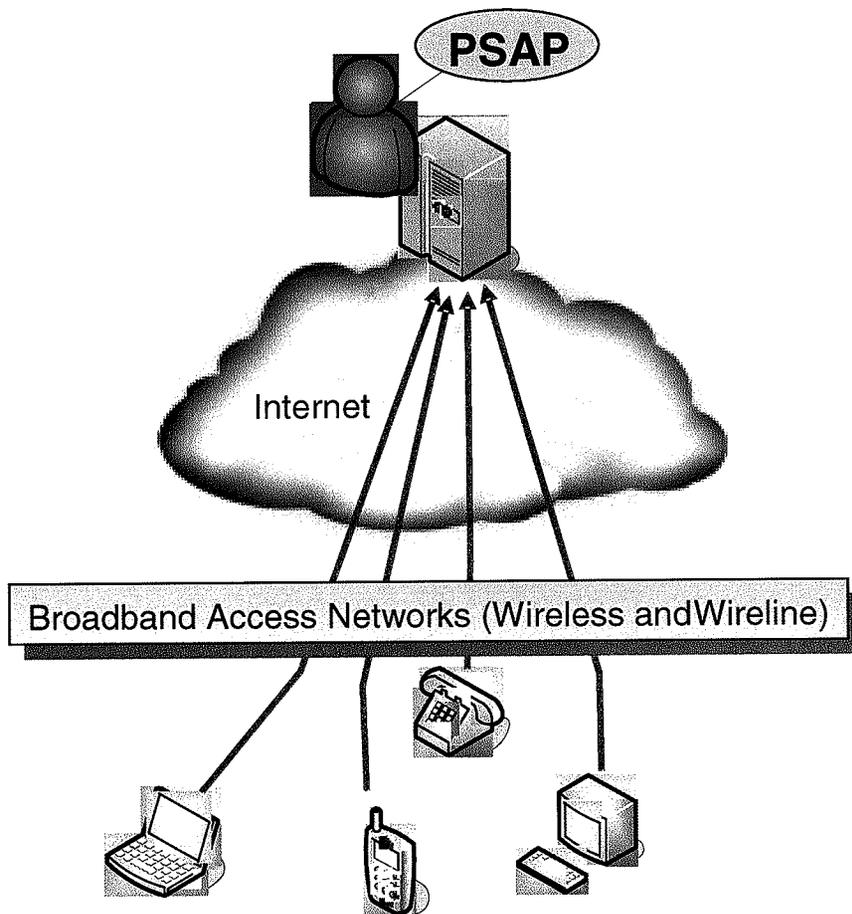
- Test point selection
  - Structure types
  - Access
  - Number of test points
- Outdoor/Indoor test point distribution
  - Blending of results indicative of real E911 call distribution
- Establishing a “ground truth” reference
- Tests need to represent accuracy/yield/latency performance with statistically significant data

## VoIP Auto-location Considerations

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- Fundamental Issue: Is VoIP or the Internet the equivalent of the PSTN?
  - The Internet
  - IP packets instead of circuits
  - Bytes instead of minutes
- If Internet is a PSTN equivalent, then what is VoIP?
  - One of many “applications” on the Internet
  - Not the equivalent of POTS: POTS is equally concerned with access and circuit service as with moving voice over the circuits
- Location information critical to E911
  - Fundamental to call routing and dispatch
  - POTS: determined from calling-line ID; static relationship.
  - Cellular: determined from serving network; dynamic determination.
  - IP: determined from serving network; dynamic determination (NENA i2, i3, ECRIT).

# Internet and PSTN comparison



Thank You

COMMSCOPE®