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January 10, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Amendment of parts 1, 2, 22, 24, 27, 90 and 95 of the Commission's Rules to Improve Wireless Coverage Through the Use of Signal Boosters. WT Docket No. 10-4

Dear Ms. Dortch:

On Friday, January 6, 2012, Jeanine Poltronieri and Joe Marx of AT&T participated in a teleconference with Roger Noel, Joyce Jones and Moslem Sawez of the Mobility Division of the Wireless Telecommunications Bureau ("WTB"). The purpose of the call was for AT&T to provide information to WTB staff regarding the impact of distributed antenna systems ("DAS") on E911 Accuracy. The information provided by AT&T supplemented prior discussions with the Bureau on the potential impact of signal boosters on E911 location accuracy which took place during a joint ex parte meeting with TruePosition on December 21, 2011.

By way of background, AT&T uses a network-based E911 location accuracy solution, Uplink Time Difference of Arrival ("U-TDOA"), provided by its vendor TruePosition on its GSM Network. U-TDOA determines a mobile phone's location by comparing the times at which a cell signal reaches multiple Location Measurement Units ("LMUs") installed at the operator's base stations. As noted in the December 21, 2011 ex parte meeting, AT&T contracted with TruePosition to conduct testing to determine the impact of signal boosters on E911 location accuracy in a U-TDOA environment. That testing demonstrates that signal boosters degrade E911 location accuracy and can prevent E911 locates.

As was discussed in the December 21, 2011 meeting, the testing demonstrated that a signal booster, whether in an urban or rural environment, would cause statistically significant impacts to location accuracy. Moreover, the testing understated these impacts because of its methodology. The testing was conducted in the Wilmington, Delaware test bed which is well covered by TruePosition LMUs. As AT&T explained to WTB staff, in a rural scenario, the use of signal boosters would more significantly impact location accuracy as fewer cell site contributors are available to obtain E911 mobile location. In addition, the scenario tested involved the presence of a single signal booster in a cell site. Because the presence of multiple signal boosters in a cell site would raise the noise floor, it is likely that the presence of multiple boosters would also increase the demonstrated impacts on location accuracy.

The teleconference with the staff involved a discussion of the impact of DAS on E911 location accuracy because DAS installations also cause delayed signals similar to the delay

caused by signal boosters. WTB staff inquired how AT&T handled DAS installations for E911 Accuracy. AT&T indicated that DAS installations are engineered into the network and the timing delay experienced by the DAS can be accommodated by measuring the delays associated with the DAS at installation and using those values to correct the location accuracy. This solution would not be possible with consumer off-the-shelf signal boosters since they may not be at fixed locations and are not engineered into the network.

AT&T also informed the Bureau staff that, after internal review and discussions with Verizon Wireless and Wilson Electronics, AT&T determined that it is not able to support the Verizon Wireless/Wilson joint proposal for Commission authorization of third party signal boosters. The joint proposal does not contain sufficient network controls to enable AT&T to prevent the interference third party boosters would introduce to its network and the resultant degradation of service to AT&T's customers. This information was communicated to Verizon Wireless and Wilson Electronics in December of 2011.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Should you have any questions, please contact the undersigned.

Sincerely,

/s/Jeanine Poltronieri
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cc (via e-mail): Roger Noel
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