

NENA

The 9-1-1 Association

1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SE
Washington, D.C. 20554

March XXth, 2012

RE: WT Docket No. 11-49, Notice of *ex parte* presentation

Dear Ms. Dortch:

On Wednesday, April 11th, 2012, I made an *ex parte* presentation on behalf the NENA: The 9-1-1 Association to David Furth of the Commission's Public Safety and Homeland Security Bureau related to a Public Notice issued by the Wireless Telecommunication Bureau concerning the petition of Progeny LMS, LLC's ("Progeny") for a waiver of certain of the Commission's rules for LMS services operating in the 900MHz ISM band.

During this presentation, I noted that NENA has been an active participant in the Commission's proceedings concerning the evolution of 9-1-1, including proceedings related to the advancement of wireless location accuracy.¹ I related that NENA has been made aware that some commenters in the Progeny proceeding have questioned the benefits that additional location technologies and methods, such as that proposed by Progeny, might provide for public safety. In response, I noted that NENA considers continual improvement of wireless location technologies – by any means – is critically important to the safety of an increasingly mobile public, and that NENA considers it important that the Public Safety and Homeland Security Bureau continue to monitor proceedings in other bureaux that may impact future location accuracy proceedings.

During this presentation, I made no comment on the substantive results of Progeny LMS's testing report, and indicated that NENA expressly declines to do so. I did, however, note that novel location systems could provide substantial public-interest benefits by ensuring that 9-1-1 callers receive uniformly rapid and accurate dispatching, and that dispatching public safety personnel to the correct location is fundamental to the operation of the 9-1-1 system, and robust, rapid, and accurate location solutions are a critical component in the transition from today's 9-1-1 service to tomorrow's Next Generation 9-1-1.

Sincerely,



Telford E. Forgety, III, "Trey"
Director of Government Affairs
& Regulatory Counsel

¹ See, e.g., *In re* Wireless E9-1-1 Location Accuracy requirements and E9-1-1 Requirements for IP-Enabled Service Providers, Comments of The National Emergency Number Association, at 1, 11-12 (Jan. 20, 2011).