



June 8, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th St. SW
Washington DC 20554

RE: **EX PARTE** in Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules, GN Docket No. 11-117; Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

On June 7, 2012, Cisco Systems met telephonically with Henning Schulzrinne, Chief Technology Officer, Office of Strategic Planning, to discuss mechanisms utilizing home gateways to assist in providing location information to public safety answering points (PSAPs) for 911 voice communications. Representing Cisco were: Marc Linsner and Russ Gyrek from Consulting Engineering, Pouya Taaghol, Kendra Harrington, and Ed Matsukane from Cisco's Home Networking Business Unit, and myself.

The conversation focused on the problem of presenting accurate indoor location information to PSAPs and the various Internet Engineering Technical Forum (IETF) identified methods of providing location. FCC staff briefed Cisco on their latest thinking about deploying a method known as "location by reference" in which home gateways and client devices would play a role in providing a URL to the PSAP, which in turn would query a service provider database for dispatch location. The conversation also discussed an option where the home user or service provider deploying a gateway in a home would enter a location address that the home gateway could use to generate location information to the PSAP. Both methods would require some development on the part of home gateway manufacturers. Among the topics discussed with respect to these options were privacy concerns and location accuracy.

Cisco did not take a position for or against these methods, but stated its desire to work with the FCC staff as consideration of indoor location information progressed. Cisco reiterated its interest in understanding the FCC's views, and also stated its commitment to understand service provider views – both network

infrastructure and over the top providers. Cisco stated its belief that the IETF architecture has the potential to improve upon location data accuracy for emergency applications.

Sincerely,

CISCO SYSTEMS, INC.

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cc: Henning Schulzrinne