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April 5, 2013

VIA ECFS

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

Re: Notice of Permitted Ex Parte Presentation - Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114

Dear Ms. Dortch:

On April 3, 2013, TruePosition, Inc. (“TruePosition”) met with the following Federal Communications Commission (“FCC”) staff to discuss the Indoor Location Test Bed Report released by the Communications Security, Reliability and Interoperability Counsel (“CSRIC”) and TruePosition’s Indoor Test Report:

David Turetsky – Bureau Chief of the Public Safety and Homeland Security Bureau
David Furth – Deputy Bureau Chief for the Public Safety and Homeland Security Bureau
Timothy May – Analyst, Public Safety and Homeland Security Bureau
Henning Schulzrinne – Chief Technology Officer

TruePosition was represented by Robert Anderson, Robert Morrison, Joel Jankowsky (Akin Gump), and the undersigned.

TruePosition discussed its decision to test in the Wilmington, Delaware market the indoor location accuracy of a hybrid technology employed by TruePosition to provide location information for E911 calls. The hybrid solution consists of two components: Uplink Time Difference of Arrival and assisted Global Positioning System. TruePosition explained that Wilmington was selected because it offered an environment that is similar to the test bed employed by the CSRIC working group in the San Francisco Bay area (“Bay Area Test Bed”). TruePosition addressed the similarities of the Wilmington, Delaware test bed to the Bay Area Test Bed employed by CSRIC as well as the similarities in the testing methodology employed by TechnoCom, which performed both the CSRIC testing and TruePosition’s testing. The only significant difference between the Bay Area Test Bed and the Wilmington testing is that only Urban and Suburban environments were tested in Wilmington. Downtown Wilmington was deemed too small by TechnoCom to offer a realistic Dense Urban environment and rural areas near Wilmington have a cell site density higher than what was tested in the Rural Environment of

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the Bay Area Test Bed. TruePosition reviewed the results of TechnoCom's testing, which demonstrate that TruePosition's solution exceeded the current outdoor requirements for a network based positioning solution (100m 67%, 300 m 90%) in indoor test locations. TruePosition explained that the results show that reliable indoor accuracy is achievable with existing technology. Finally, TruePosition compared the Wilmington test results with the results of the technologies tested in the Bay Area Test Bed (see attachment for a summary of the test results).

This disclosure is made in compliance with 47 C.F.R. §1.1206.

Sincerely,

/s/ _____
Tom W. Davidson, Esq.

Enclosure

cc: Mr. Henning Schulzrinne
Mr. David Turetsky
Mr. David Furth
Mr. Timothy May

- TruePosition's testing yielded the following results:

Accuracy	67%	90%	95%	Yield
Urban	87.3 m	140.7 m	168 m	100%
Suburban	66.1 m	116.2 m	163 m	100%

- NextNav's testing yielded the following results:

Accuracy	67%	90%	95%	Yield
Urban	62.8 m	141.1 m	196.1 m	95.4%
Suburban	28.6 m	52.9 m	62.2 m	100%

- Polaris Wireless' testing yielded the following results:

Accuracy	67%	90%	95%	Yield
Urban	198.4 m	447.8 m	729.9 m	99.9%
Suburban	232.1 m	420.7 m	571.4 m	99.8%

- Qualcomm's testing yielded the following results:

Accuracy	67%	90%	95%	Yield
Urban	226.8 m	449.3 m	507.1 m	90.8%
Suburban	75.1 m	204.8 m	295.7 m	91.4%