

# Akin Gump

STRAUSS HAUER & FELD LLP

**TOM W. DAVIDSON**

1.202.887.4011/fax: 202.955.7719  
tdavidson@akingump.com

April 25, 2013

VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

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

Dear Ms. Dortch:

On April 23, 2013, TruePosition, Inc. (“TruePosition”) met with the following Federal Communications Commission (“FCC”) staff to discuss the results of E911 indoor location accuracy testing of the U-TDOA technology in dense urban areas in New York City and comparison testing of the indoor location accuracy of various E911 location technologies in Austin and Frisco, Texas:

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  
David Siehl, Public Safety and Homeland Security Bureau  
Dana Zelman, Public Safety and Homeland Security Bureau  
Eric Ehrenreich, Public Safety and Homeland Security Bureau  
Aaron Garza, Public Safety and Homeland Security Bureau

TruePosition was represented by Robert Anderson, Robert Morrison, Joel Jankowsky (Akin Gump), and the undersigned. The presentation is summarized in the attached power point that was distributed to the FCC staff at the meeting. The details of the Manhattan test results also are attached in the report prepared by Verizon Laboratories Inc. (“Verizon”).

Specifically, at the meeting TruePosition discussed the results of Verizon’s independent testing of the indoor location accuracy in mid-town Manhattan of the U-TDOA technology employed by TruePosition to provide location information for E911 calls. TruePosition addressed the similarities of the dense urban areas in Manhattan where the Verizon test of U-TDOA was conducted to the dense urban areas in San Francisco where testing for the Communications Security, Reliability and Interoperability Counsel (“CSRIC”) was conducted by

Ms. Marlene H. Dortch  
April 25, 2013  
Page 2

TechnoCom as well as the similarities of the methodology employed by Verizon to the TechnoCom test plan used in San Francisco. TruePosition reviewed the results of the CSRIC indoor testing of the NextNav, Polaris and Qualcomm location technologies in dense urban areas in San Francisco with the results of Verizon's testing of TruePosition's location technology in indoor locations in dense urban areas in Manhattan.

TruePosition also provided the FCC staff with a summary of the results of the real world testing indoors of the location accuracy of currently deployed E911 technologies (i.e., U-TDOA on a GSM network, A-GPS/AFLT on a CDMA network, and A-GPS/RTT on a UMTS network) in suburban (Frisco, Texas) and urban (Austin, Texas) environments. The results of the real world test show that U-TDOA outperformed A-GPS/AFLT and A-GPS/RTT with respect to indoor location accuracy in urban and suburban environments and that U-TDOA was the only technology tested that meets or exceeds indoors, the current FCC outdoor E911 location accuracy requirements for network-based technologies.

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

Sincerely,

/s/  
Tom W. Davidson, Esq.

Enclosures

cc: Mr. Henning Schulzrinne  
Mr. David Furth  
Mr. Timothy May  
Mr. David Siehl  
Ms. Dana Zelman  
Mr. Eric Ehrenreich  
Mr. Aaron Garza