

Nneka Ezenwa Chiazor  
Executive Director  
Federal Regulatory



September 13, 2013

1300 I Street, NW  
Suite 400 West  
Washington, DC 20005  
(202) 515-2466  
(202) 336-7922 (fax)  
nneka.chiazor@verizon.com

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

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

Dear Ms. Dortch:

On September 10, 2013, Robert Morse and the undersigned of Verizon, and Susan Sherwood of Verizon Wireless (by teleconference), discussed matters relating to the above-referenced proceedings with the following Public Safety and Homeland Security Bureau staff: David Turetsky, Chief; David Furth, Deputy Bureau Chief; Eric Ehrenreich; John Healy; Tim May; Nicole McGinnis; Erica Olsen (by teleconference); and Dana Zelman.

The parties principally discussed the August 12, 2013 report of the California Chapter of the National Emergency Number Association (“CALNENA”) concerning carriers’ delivery of Phase II caller location information to five PSAPs in California, and Verizon Wireless’ assessment of its own delivery of Phase II data to those PSAPs. We explained that: (1) CALNENA did not report the percentage of E911 calls for which Verizon Wireless is delivering Phase II location information to its Mobile Positioning Center (“MPC”) – which Verizon Wireless provided at rates of 91%-95% for the five PSAPs in the final six months of the period covered by the CALNENA report; (2) under well-established technical standards, PSAPs are responsible for retrieving that data from the MPC via a “bid” and “re-bid” process; and (3) our data indicates that, for a sizeable majority of 911 calls, the five PSAPs did not re-bid for the Phase II data during the call. Verizon’s formal response to the CALNENA report, submitted yesterday in PS Docket No. 07-114, explains these findings and the underlying legal background in more detail.<sup>1</sup>

We also discussed the Bureau’s planned October 2, 2013 workshop on E911 Phase II location accuracy, which seeks input on the Phase II data delivery issues raised by the CALNENA report, as well as the separate issue of location accuracy in outdoor and indoor environments. We specifically discussed the various location techniques already utilized in Verizon Wireless’ highly accurate Assisted GPS (“A-GPS”) location accuracy solution (also

---

<sup>1</sup> See Letter from Nneka Chiazor, Verizon, to Marlene H. Dortch, in PS Docket No. 07-114 (Sept. 11, 2013).

described in Verizon's response to the CALNENA report).<sup>2</sup> We reiterated the company's intention to utilize a similar A-GPS solution for voice over LTE (VoLTE) once that service is launched.<sup>3</sup>

Please contact the undersigned if there are questions regarding this submission.

Sincerely,

A handwritten signature in black ink that reads "Nneka Chazor". The signature is written in a cursive, flowing style.

---

<sup>2</sup> See *id.* at 5.

<sup>3</sup> See Letter from Nneka Ezenwa, Verizon, to Marlene H. Dortch, in GN Docket No. 11-117, PS Docket No. 07-114, and WC Docket No. 05-196 (May 29, 2012).