

September 25, 2013

VIA ELECTRONIC MAIL

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

Re: Comments of TeleCommunication Systems in *Wireless E9-1-1 Location Accuracy Requirements, PS Docket No. 07-114*

Dear Ms. Dortch:

TeleCommunication Systems, Inc. ("TCS") hereby provides the following brief comments in response to the Federal Communication Commission's ("FCC" or "Commission") September 9, 2013 request in this docket¹, and in advance of the scheduled October 2, 2013 Workshop, to which TCS formally requests participation.

TCS has reviewed the CALNENA² *ex parte* filing that was the genesis of this matter as well as the subsequent *ex parte* filings of AT&T, Verizon, and T-Mobile.³ In combination, these filings lead to the following comments and topics for further investigation at the Workshop:

- A) It is clear that all parties engaged in these filings are acting from a sincere interest in improving 9-1-1 services by collecting and analyzing 9-1-1 call data in the context of the FCC mandated requirements. As recently as this past Tuesday, CALNENA acknowledged that the purpose of the filing was to "spur discussion" of the 9-1-1 location issue and seek solutions to the concerns that CALNENA has raised, and other participants echoed those sentiments.⁴

¹ DA 13-1873 Released: September 9, 2013 - PUBLIC SAFETY AND HOMELAND SECURITY BUREAU ANNOUNCES WORKSHOP ON E911 PHASE II LOCATION ACCURACY PS Docket No. 07-114; Workshop Date: October 2, 2013; Comments Due: September 25, 2013

² Letter from Danita L. Crombach, ENP, CALNENA, to the Honorable Mignon Clyburn, Chairwoman, Federal Communications Commission, PS Docket No. 07-114 (filed Aug. 12, 2013) (CALNENA *ex parte*).

³ *Ex parte* of T-Mobile USA, Inc. filed September 5, 2013; *Ex parte* of AT&T Services, Inc. filed September 9, 2013; and *Ex parte* of Verizon and Verizon Wireless filed September 11, 2013.

⁴ Comments of Danita Crombach, president of CALNENA, and Comments of Brian Fontes, NENA Chief Executive Officer at September 23, 2013 public event as reported by TRDaily in the article, *CALNENA PRESIDENT DEFENDS FILING ON 911 LOCATION ACCURACY*, that same date.

- B) Though there are alternative views as to the reasons leading to CALNENA's perception that there is insufficient or declining Phase II location information delivery to certain PSAPs, no participant doubts the importance of accurate and timely wireless 9-1-1 call location information. In fact, it is TCS' belief that the CALNENA study has uncovered a possible conflict in these two goals: accurate call location information and timely call location information. With the explicit FCC requirements being placed on location accuracy and the recent discussions on the topic of testing to ensure high location accuracy, the timeliness of call location information has received comparatively less attention. There has always been a trade-off between these two goals, and the current CALNENA discussion affords us the opportunity to discuss these goals.
- C) The available data indicates that information delivery processes and call handling procedures may need refinement or updating, especially in view of continually improving location and call delivery technologies, consistent with the open questions posed by the Commission for the Workshop. As a leading provider of 9-1-1 location information and 9-1-1 location accuracy technologies, TCS welcomes the opportunity to support a constructive dialog in this arena.
- D) One such opportunity is to review 9-1-1 location accuracy, and investigate the use of horizontal uncertainty ("HUNC") as a more beneficial and cost-effective location accuracy paradigm.⁵ Had HUNC reporting programs been in place during the review period cited in the CALNENA data, the availability of Phase II call location information would have been clear and more focus could have been placed on the data trends and anomalies. Any actual or perceived anomalies in 9-1-1 call location accuracy would have been identified earlier and more cost effectively.

⁵ Comments of TeleCommunication Systems, Inc. in *In the Matter of Wireless E911 Location Accuracy Requirement*, PS Docket No. 07-114, filed October 6, 2008, and Ex Parte of TeleCommunication Systems, Inc. in *In the Matter of Wireless E911 Location Accuracy Requirement*, PS Docket No. 07-114, filed October 27, 2008.

TCS looks forward to exploring these and additional issues at the Commission's Workshop.

Sincerely,



Timothy J. Lorello
Senior Vice President



Kim Robert Scovill, Esq.
Senior Director