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Via Electronic Filing

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

**Re: *EX PARTE* PRESENTATION - Wireless E-911 Location Accuracy
Requirements – PS Docket 07-114, DA 13-1873**

Dear Ms. Dortch:

On September 26, 2013, Charles McKee, Ray Rothermel, Allison Jones, Stephanie Teng-Ossman (via teleconference), Tim Hogle (via teleconference), and Jeanna Green (via teleconference) on behalf of Sprint Corporation, met with David Furth, Timothy May, Eric Ehrenreich, Dana Zelman, John Healy, David Siehl, Nicole McGinnis, and Erika Olsen (via teleconference) of the Public Safety and Homeland Security Bureau (“Bureau”). During the meeting, we discussed matters related to the above-referenced Federal Communications Commission (“FCC”) docket on E-911 location accuracy.

The representatives from Sprint discussed the attached presentation and analysis regarding Sprint’s compliance with the FCC’s location accuracy rules and provided the FCC attendees with a copy of the attachment. Sprint explained that its nationwide wireless network is compliant with current FCC E9-1-1 location accuracy rules on a per-county basis at the accuracy level of 50 meters for 67% of calls and 150 meters for 80% of calls.

The meeting participants also discussed the *ex parte* letter filed by the California Chapter of the National Emergency Number Association (“CALNENA”) on August 12, 2013. Sprint argued that CALNENA’s analysis does not accurately portray how frequently a wireless carrier actually delivered Phase II E9-1-1 location information to the Mobile Positioning Center (“MPC”) and is instead simply an indication of how often the Public Safety Answering Points (“PSAPs”) request the Phase II information. Sprint maintains a location accuracy management platform that continually tests location accuracy within Sprint’s coverage area. Sprint presented its own test data for the period of Sept. 19, 2011 through Sept. 16, 2013 for the counties discussed in the CALNENA filing, which indicates that Sprint is meeting the FCC’s current location accuracy requirements in all five counties.

Sprint also discussed information it had compiled regarding the number of re-bids initiated by the counties referenced in the CALNENA report. Based on Sprint’s data, re-bidding only occurred between 12% and 45% of the time in these counties. Sprint explained that unless

PSAPs re-bid for Phase II location information, they may not always receive Phase II location information even though it was likely available at the MPC. The attendees also discussed how confidence and uncertainty data may affect a PSAP's interpretation of the information they receive and questioned whether or not such data is presented in a consistent manner.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced docket.

Sincerely,

/s/ Allison M. Jones

Allison M. Jones
Counsel-Legal/Government Affairs
Sprint Corporation

Attachment

Cc:
(Via Electronic Mail - without attachment)
David Furth
Timothy May
Eric Ehrenreich
Dana Zelman
John Healy
David Siehl
Nicole McGinnis
Erika Olsen