

December 11, 2013

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
12th Street Lobby, TW-A325  
Washington, D.C. 20554

**Re: *Ex Parte* Communication, GN Docket No. 12-268, GN Docket No. 13-185,  
PS Docket 07-114.**

Dear Ms. Dortch:

On December 6, 2013, Scott Bergmann, Vice President, Regulatory Affairs, Brian Josef, Assistant Vice President, Regulatory Affairs, and Krista L. Witanowski, Assistant Vice President, Regulatory Affairs, of CTIA – The Wireless Association® (“CTIA”), met with Renee Gregory, Legal Advisor, Engineering and Technology, Wireless, and Incentive Auctions, Office of FCC Chairman Tom Wheeler. Consistent with our comments in these proceedings, CTIA commended the FCC’s commitment to the incentive auction and AWS-3 proceedings to find more spectrum to auction for commercial wireless services. CTIA also stressed to the Commission that, given the mobile industry’s critical role in the U.S. economy, more spectrum must be identified, allocated, and auctioned to ensure continued investment in this critical ever-expanding industry. CTIA urged the FCC to remain focused on working with NTIA and other stakeholders to identify and clear the 1755-1780 MHz band, which is ideally suited for pairing with the 2155-2180 MHz band. In addition, CTIA explained that the 1695-1710 MHz band is extremely well-suited for mobile broadband, and highlighted the value of pairing this band with another 15 MHz of mobile broadband spectrum.

Finally, CTIA highlighted our serious concern with a study filed by the California state chapter of NENA (CALNENA) that asserted call location data is not meeting Phase II accuracy requirements. Consistent with its December 5, 2013 letter to Chairman Wheeler, CTIA noted that wireless carriers’ investigations into the matter led to the clear conclusion that the CALNENA study mischaracterizes carrier performance, which complies with FCC rules and standards. The carrier findings underscore the importance of PSAP best practices involving a process known as “re-bidding” to acquire Phase II location information after the initial call delivery. These reviews make clear that wireless carriers are meeting their 911 commitments to consumers and the public safety community.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being electronically filed with your office. If you have any questions regarding this submission, please contact the undersigned.

Sincerely,

*/s/ Krista L. Witanowski*

Krista L. Witanowski  
AVP, Regulatory Affairs  
CTIA-The Wireless Association

cc: Renee Gregory