

December 20, 2013

James Arden Barnett, Jr.

VIA ECFS

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

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

Dear Ms. Dortch:

On December 19, 2013, James Arden Barnett, Jr. of the law firm Venable LLP, attorney representing TruePosition, Inc., a member of the Find Me 911 Coalition, met with Erin McGrath, Public Safety Communications Advisor to Commissioner O’Rielly, at the Federal Communications Commission (“FCC”).

The meeting was convened on behalf of TruePosition, Inc. to introduce Ms. McGrath to the Find Me 911 Coalition, its goals and mission. He discussed with Ms. McGrath the data on serious location accuracy problems filed with the FCC by California, North Carolina, Utah, Pennsylvania and other states, showing that the Public Safety Answering Points (PSAPs) are not receiving the locations for wireless 911 calls an acceptable percentage of the time on initial calls. Mr. Barnett noted that 911 professionals who spoke at the FCC’s E911 Location Accuracy Workshop called for indoor accuracy requirements and faster delivery of the locations as a matter of public safety. Since technology exists for an accurate location, indoors and outdoors within seconds, the choice of one technology (such as Assisted GPS) that requires an unobstructed path to more than one satellite and an initial wait of 30 seconds (with perhaps one or more ‘re-bids’ or updates which may take 30 seconds each time) is not acceptable for public safety purposes.

Mr. Barnett discussed with Ms. McGrath what happens when Assisted GPS fails or is unable to deliver a latitude and longitude for a wireless call, falling back to other less accurate technologies such as RTT and AFLT. These technologies can provide locations which are much less accurate and may, at times, be misleading to the PSAP professionals.

Citing these reasons as a major public safety problem, Mr. Barnett urged the FCC to move expeditiously on adopting a Notice of Proposed Rulemaking for technology-neutral indoor location requirements with both short term and long term solutions. Waiting three years or more is not acceptable when tens of millions of wireless 911 calls each year may not have

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good Phase II locations provided. Mr. Barnett stressed that new requirements are the optimal way to address the public safety concerns regarding the problems with indoor location accuracy and the need to deliver accurate locations more quickly than can be achieved by Assisted GPS technology alone. Mr. Barnett also provided Ms. McGrath with the attached materials.

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

Sincerely,

/s/ James Arden Barnett, Jr.  
James Arden Barnett, Jr.  
Rear Admiral USN (Ret.)  
*Venable LLP*

cc: Ms. Erin McGrath