

# JONES DAY

51 LOUISIANA AVENUE, N.W. • WASHINGTON, D.C. 20001.2113  
TELEPHONE: +1.202.879.3939 • FACSIMILE: +1.202.626.1700

DIRECT NUMBER: (202) 879-3630  
BOLCOTT@JONESDAY.COM

January 24, 2014

## VIA ELECTRONIC FILING

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington D.C. 20554

**Re: Permitted Oral *Ex Parte* Notice**  
**PS Docket No. 07-114**

Dear Ms. Dortch:

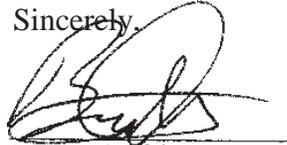
On January 22, 2014, representatives of NextNav, LLC (“NextNav”), met with Commissioner Michael O’Rielly and his legal advisor, Erin McGrath to introduce them to NextNav’s indoor location technology and to discuss the Commission’s efforts in regards to wireless indoor location accuracy to support E911 emergency first responders. Participating in the meeting on behalf of NextNav were Gary Parsons, CEO of NextNav; Bruce Cox, Senior Director, Regulatory & Public Safety for NextNav; Justin Lilley of TeleMedia Policy Corporation; and the undersigned.

During the meeting, the participants discussed the capabilities of NextNav’s indoor location technology and its participation in the CSRIC Working Group process, which demonstrated that NextNav’s technology can achieve highly accurate location determinations in very challenging environments such as deep indoors in dense structures. The participants also discussed other efforts that have been undertaken to identify the needs of public safety for indoor location capabilities and the ability of indoor location technology vendors to supply effective solutions. For example, the Commission’s workshop on indoor location requirements highlighted the needs of public safety for indoor location rules that address (1) horizontal accuracy, (2) floor level vertical accuracy, (3) a rapid time to first fix with automatic rebidding, (4) high yield, (5) an adequate verification process, and (6) a reasonable timeline for phased implementation. The workshop also verified that multiple indoor location technology vendors can, or soon will be able to, satisfy such technical requirements and make them available for use by wireless carriers. The Commission can rely on these findings and the record established over the past few years of testing in its development and adoption of an NPRM on these issues.

Marlene H. Dortch  
January 24, 2014  
Page 2

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Olcott", written over a horizontal line.

Bruce A. Olcott  
Counsel to NextNav, LLC