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VIA ELECTRONIC FILING

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

Re: *Wireless E911 Location Accuracy Requirements – Docket 07-114*

Dear Ms. Dortch:

In the FCC's Third Report and Order on Wireless E911 Location Accuracy Requirements, the Commission recognized that, due to the increased penetration of A-GPS capable handsets, network-based carriers were migrating to handset location technologies, and concluded that the network-based accuracy standard should sunset at an appropriate time after the eight-year implementation period.¹ Thus, the Commission set its expectation that network-based carriers must eventually comply with the handset-based location accuracy standards in its rules.² However, in that order and the accompanying rules, the Commission did not specify a timeframe for moving to a single accuracy standard nor did it establish the process for a network-based carrier to make that transition to handset-based location accuracy standards.

AT&T previously announced it would be shutting down its 2G Network in the January, 2017, timeframe, and as such, AT&T would begin satisfying its E911 obligations via handset-based technologies. Accordingly, AT&T met with the Public Safety and Homeland Security Bureau on January 23, 2014, to discuss this transition and its plans to meet the handset-based location accuracy standard. During this meeting, AT&T shared information from the attached slide deck to document how AT&T anticipates approaching this transition.

As of the date of this letter, AT&T will be considered a handset-based carrier and will measure compliance based on the location accuracy associated with handset-based technologies. Under the Commission's rules, handset-based carriers have two location accuracy benchmarks—the second year and the eighth year benchmarks; whereas network-based carriers have multiple benchmarks, including one at year five.

¹ See, e.g., Wireless E911 Location Accuracy Requirements, PS Docket no. 07-114, et. al., *Notice of Proposed Rulemaking, Third Report and Order, and Second Further Notice of Proposed Rulemaking*, 26 FCC Rcd 10074, para. 18 (2011).

² *Id.*, at para. 19.



Because the two-year *handset-based benchmark* has already passed, AT&T will use the date of five-year, *network-based benchmark* (2016) to comply with the two-year handset-based benchmark (the current handset-based accuracy standard) rather than waiting until January 18, 2019 to comply with the eight-year handset benchmark.

Sincerely,

/s/ Joseph P. Marx
Assistant Vice President, AT&T Services Inc

Cc (via e-mail):
David Furth
Timothy May
David Simpson