September 12, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th St. SW
Washington DC 20554

RE: **EX PARTE** in Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules, GN Docket No. 11-117; Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

On September 11, 2014, Cisco and TeleCommunication Systems (TCS) met with members of the FCC's Public Safety and Homeland Security Bureau in Cisco's Washington DC office to discuss the use of Wi-Fi and other technologies in providing indoor location to public safety for 911 purposes. Attending the meeting were: David Furth, Tim May, David Siehl and Rasoul Safavian, all from the Public Safety and Homeland Security Bureau, as well as Martin Doczkat and (on the phone) Nnake Nweke and Ron Repasi of the Office of Engineering and Technology. Attendees from TCS were: Tim Lorello, and by phone - Mark Lanphear and Roderic Robinson. From Cisco were: Marc Linsner and Scott Gerber.

The company representatives stated that leveraging existing location information already being generated for many commercial purposes is a fast path to delivering indoor location in that Wi-Fi coverage zones are becoming more ubiquitous, and span urban, suburban and rural environments. In addition, the companies stated that by creating mechanisms that allow public safety to use location data that already exists in Wi-Fi and other technologies, the information deliverable to public safety would include a "dispatchable" location.

TCS and Cisco also provided a demonstration of the technology, using Cisco's Wireless Local Area Network and TCS's GEM9-1-1™ client which operates as a gateway between the enterprise network (in this case, Cisco's) and the PSAP. In the demonstration, a Wi-Fi enabled smartphone was placed at various locations inside Cisco's 9th floor office suite at 601 Pennsylvania Ave NW. The companies simulated a 911 text (no 911 communication was actually placed to the DC PSAP) and the GEM9-1-1 client displayed the "dispatchable" location – indicating street address, building identifier, floor number, and suite number – along with a floor plan of the Cisco office suite showing the location of the phone. PSAPs with advanced 911 capability could take advantage of the floor plan maps, although TCS stated that it can also provide textual information to PSAPs with only the "dispatchable" location. In the demo, the location accuracy of this technology was between 5-10 meters.

Attached are the materials that the companies used to describe the evolution of the technology solution. The companies also reviewed a list of open issues that would need to be addressed in order to enhance the service and broaden adoption of its use. Resolution of these issues remains a work in progress, and the companies invited the FCC staff to identify any open issues that may be missing from this list.

Respectfully submitted,

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