

January 26, 2015

**VIA ELECTRONIC FILING**

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

**Re: *Written Ex Parte*  
Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114**

Dear Ms. Dortch:

On January 22, 2015, Meredith Attwell Baker, President and CEO of CTIA—The Wireless Association® (“CTIA”) held separate telephone conversations with Chairman Tom Wheeler, Commissioner Mignon Clyburn, Commissioner Michael O’Rielly, Commissioner Ajit Pai, and Commissioner Jessica Rosenworcel regarding the above-referenced proceeding. On January 23, 2015, Scott Bergmann and Brian Josef of CTIA spoke by telephone with Admiral David Simpson, Chief of the Public Safety and Homeland Security Bureau. On January 23 and January 26, 2015, Scott Bergmann and Brian Josef of CTIA spoke by telephone with Louis Peraertz, Legal Advisor to Commissioner Mignon Clyburn. During the conversations CTIA reiterated strong support for the public safety-industry *Roadmap for Improving E911 Location Accuracy* (“the Roadmap”) that will improve wireless 9-1-1 indoor location accuracy and appreciates the opportunity to work with the Commission to achieve this goal.

During the conversations, CTIA discussed the Roadmap together with additional commitments filed in prior ex parte letters (January 21, 2015 and January 23, 2015), along with potential additional steps that wireless carrier signatories might take. As a result of those discussions and in response to specific inquiries, wireless carrier signatories consent to the following additional provisions which will meaningfully provide the Commission and Commissioners with even greater certainty and oversight that the Roadmap’s comprehensive approach to enhance wireless 9-1-1 indoor location accuracy will be achieved:

- Adoption of a rule mandating compliance with two additional performance metrics in furtherance of the Roadmap. Specifically, carrier signatories consent to provide a location fix using heightened location accuracy technologies for 40 percent of all wireless 9-1-1 calls (*i.e.*, within 50 meters or dispatchable location) within two years, and for 60 percent of all wireless 9-1-1 calls within five years. Signatory carriers consent to FCC codification of these performance metrics, in addition to performance metrics of 50 percent of all wireless 9-1-1 calls within three years and 80 percent of all wireless 9-1-1 calls within six years;
- Provide the Commission with the Roadmap’s 36-month assessment of the deployment of the dispatchable location solution; and



- Adoption of a rule that requires the delivery of uncompensated barometric pressure sensor data to PSAPs from compatible handsets that support such a delivery capability within three years, without regard to the Roadmap conditions.

We appreciate the continued engagement with the Commission to improve the performance metrics and reporting requirements surrounding the Roadmap's implementation.

In addition, the parties discussed the fact that the security of wireless consumers has been, and remains, a top priority for the wireless industry. It is critical that policymakers, public safety and the wireless industry should keep all secure and viable options on the table to improve 9-1-1 services. Along these lines, CTIA and wireless providers will work with the FCC and other relevant agencies to address any security concerns regarding use of GNSS for 9-1-1 location services. It is important to stress that neither the Roadmap, nor the Commission's approach as we understand it, mandate or require use of foreign satellites for 9-1-1 purposes.

CTIA and wireless providers reiterated that the most effective way to improve 9-1-1 service is through the use of commercial location based technologies like Wi-Fi and Bluetooth to provide first responders with the right dispatchable location, or "door to kick in." We hope that the FCC will move quickly to adopt rules that harness the benefits that dispatchable location solutions will bring to consumers.

CTIA and its member companies are committed to improving indoor wireless 9-1-1 location accuracy and pursuing a cooperative, collaborative effort with the Commission, the public safety community and all other stakeholders. We believe the Roadmap will achieve these improvements.

Respectfully Submitted,

*/s/ Scott K. Bergmann*

Scott K. Bergmann  
Vice President, Regulatory Affairs  
CTIA—The Wireless Association®