

January 23, 2015

**VIA ELECTRONIC FILING**

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

**Re: Wireless E-9-1-1 Location Accuracy Requirements, PS Docket No. 07-114**

Dear Ms. Dortch:

On January 22, 2015, representatives from AT&T Mobility, Sprint, T-Mobile and Verizon (collectively, the “carrier signatories”), together with representatives from the Association of Public-Safety Communications Officials (“APCO”) International, the National Emergency Number Association (“NENA”), and CTIA—The Wireless Association®, met with FCC representatives primarily from the Public Safety & Homeland Security Bureau, as indicated in Attachment A. The parties discussed the Roadmap to improve indoor wireless 9-1-1 location accuracy and recent amendments thereto.

The signatories discussed the benefits of the Roadmap, including dispatchable location and the commitment to provide public safety live 9-1-1 call data to track various positioning source technologies and evaluate improved location performance indoors, what some have called a “sea-change” for assessment purposes. The signatories also discussed the amendments to the Roadmap, filed by the carrier signatories and supported by APCO and NENA, which include the following new commitments: (1) quantifiable indoor-specific metrics to assure widespread wireless 9-1-1 indoor positioning fixes, including vertical fixes; (2) performance metrics to apply to all 9-1-1 calls, not just Voice-over-LTE (“VoLTE”) calls, in later years; and (3) a National Emergency Address Database Privacy and Security Plan.<sup>1</sup>

In addition, we discussed the following ways to further improve indoor 9-1-1 location accuracy:

*Reporting.* While FCC staff acknowledged the benefits of the live 9-1-1 call data described in the Roadmap, staff expressed its desire for more granular information to evaluate specific improvements in 9-1-1 location accuracy performance. Accordingly, the carrier signatories will commit to collect and report on live 9-1-1 call data in a manner that allows evaluation of individual positioning source methods delivered in different morphologies (*e.g.*, dense urban, urban, suburban, rural) within the six regions identified for reporting, recognizing

---

<sup>1</sup> See Letter from AT&T Mobility, Sprint, T-Mobile USA and Verizon to Marlene H. Dortch, FCC, PS Docket No. 07-114 (filed Jan. 21, 2015); Letter from APCO to Marlene H. Dortch, FCC, PS Docket 07-114 (filed Jan. 21, 2015); Letter from NENA to Marlene H. Dortch, FCC, PS Docket 07-114 (filed Jan. 21, 2015).

Marlene H. Dortch  
January 23, 2015  
Page 2

that a perfect division of different morphologies may not be possible. Due to the more extensive processes that will need to be developed to collect this more granular data, carriers will collect this data quarterly and include it in their quarterly reports with more general regional call data collected on a monthly basis.

*Performance Metrics.* In response to feedback from FCC staff during the meeting, the carrier signatories further revise the updated benchmarks to satisfy the new heightened accuracy location metric to 50% of all calls in year three and 80% of all calls in year six. Under a single benchmark for all 9-1-1 calls, we understand the more granular live 9-1-1 call data described above will be an effective tool for the Commission and public safety to verify improved 9-1-1 location accuracy with these metrics.

*Uncompensated Barometric Pressure/Z-Axis Metric.* Although the Roadmap previously contemplated provision of uncompensated barometric pressure contingent on demonstrated advances in and availability of the technology, as well as a demonstrated usefulness of such capability for public safety officials, in response to the request of FCC staff, the carrier signatories agree to deliver uncompensated barometric pressure sensor data to PSAPs from compatible handsets that support such a delivery capability within three years, without regard to these Roadmap conditions. Further, the carrier signatories agree to use an independently administered and transparent test bed process to develop a specific z-axis location accuracy metric that would be used as the standard for any future deployment of z-axis solutions, in accordance with the process outlined in the Roadmap (Section 5), within three years.

These additional commitments further strengthen the Roadmap. We urge the Commission to incorporate these commitments to ensure the ability to deliver the benefits of dispatchable location to benefit wireless consumers and first responders.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being electronically filed with your office.

Respectfully Submitted,

/s/ Scott K. Bergmann

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

cc: Attachment A

**ATTACHMENT A**  
**January 22, 2015 Meeting Participants, WT Docket No. 07-114**

Jeff Cohen, APCO International  
Mark Reddish, APCO International  
Joe Marx, AT&T Services Inc.  
Mike Tan, AT&T Services Inc.  
Scott Bergmann, CTIA  
Brian Josef, CTIA  
Matt Gerst, CTIA  
Daniel Alvarez, FCC, Office of Chairman Wheeler  
David Simpson, FCC PSHSB  
David Furth, FCC PSHSB  
David Siehl, FCC PSHSB  
Erika Olsen, FCC PSHSB \*\*  
Michael Connelly, FCC PSHSB  
Rasoul Safavian, FCC PSHSB  
Renee Roland, FCC PSHSB \*\*  
Trey Forgety, NENA  
Allison Jones, Sprint \*\*  
Jeanna Green, Sprint \*\*  
Ray Rothermel, Sprint  
Eric Hagerson, T-Mobile  
Ryan Jensen, T-Mobile \*\*  
Steve Sharkey, T-Mobile  
Don Brittingham, Verizon  
Greg Romano, Verizon  
Susan Sherwood, Verizon \*\*

\*\* - participated via teleconference.