

**ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-INTERNATIONAL
NATIONAL EMERGENCY NUMBER ASSOCIATION**

July 14, 2008

Chief Derek Poarch
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20552

Re: PS Docket 07-114 and CC Docket 94-120

Dear Chief Poarch:

The Association of Public-Safety Communications Officials, International (APCO) and the National Emergency Number Association (NENA) thank you and your colleagues for continued leadership on public safety matters, specifically wireless E9-1-1. Today, we submit this letter to report to you the work that has been ongoing since the FCC released its Order addressing the location of individuals placing 9-1-1 calls from their wireless devices.

We have previously advocated that wireless E9-1-1 accuracy should be measured at the PSAP level. We are now willing to accept compliance measurements at the county level. In part, this reflects the changes that are occurring in the PSAP community, as some communities are consolidating 9-1-1 centers, and others are changing PSAP geographic boundaries to match county boundaries. Counties, unlike PSAP service areas, also reflect a stable geographic area and would be a more appropriate regulatory criteria.

The FCC should maintain the current Phase II E9-1-1 metrics for 67% of calls, location accuracy within 50 meters for handset location solutions and 100 meters for network location solutions. However, both APCO and NENA agree that it may be appropriate to make adjustments to the current requirement that 95% of wireless E-9-1-1 Phase II calls be accurate within 150 meters for handset location solutions and 300 meters for network location solutions. We recognize that satisfying this requirement at a PSAP or county level is especially difficult for many carriers due to variations in geography and system deployments. Thus, the Commission may want to consider either reducing the percentage of 9-1-1 calls from 95% or increasing the 150/300 meter metrics.

We also recognize that it may not be technically feasible for carriers to meet the modified location accuracy requirements in every county. Therefore, the FCC should establish a waiver process with clear guidelines and procedures. For such waivers, the Commission should identify factors for consideration such as technical limitations, whether the carrier is meeting network optimization criteria and whether it is maintaining state-of-the-art capabilities for its chosen location technology. In the event that a carrier seeking a waiver proposes to select a different location technology, the Commission should consider whether there is a clearly defined plan to improve location accuracy.

Public safety and wireless carriers are in current discussions on a number of other issues associated with E9-1-1, with the goal of improving information available to PSAPs. There are areas of agreement in concept; however, the details are still being developed. These include:

- **Providing more uniform uncertainty values through a standard confidence factor:** The goal is to provide PSAPs with the most accurate and highest quality E9-1-1 location information possible with existing positioning equipment, while providing consistent interpretation of the results from diverse carriers and technologies. A wireless carrier's uncertainty estimates under this proposal will therefore provide a real-time, per call estimate of the 9-1-1 caller's location, and the uncertainty estimate associated with each Phase II E9-1-1 call should be viewed with roughly the same "confidence", regardless of carrier.
- **Indoor testing:** A working group of public safety and wireless carriers, vendors and other experts should be established to develop the specifics of indoor testing.
- **Next Generation Issues:** A working group of public safety and wireless carriers and others as needed should be established to examine advances in both wireless services and PSAP call centers, with the goal of ensuring that advances in wireless and location technologies have the corresponding capability to transmit voice and data services in a usable format for PSAPs. Examples include: femtocell or access point technologies, next generation GPS satellite technology, IP platforms and PSAP access for the delivery of voice, video and data location information.

Public safety and wireless carriers continue to meet to address these issues. The key point of this letter to put on record our opinion that in light of the changes occurring both in the PSAP and wireless communities, E9-1-1 location accuracy should be determined at the county level. We are hopeful that in the very near future we, perhaps in concert with the wireless industry, can provide you with greater details on assessing wireless carrier compliance at the county level as well as more details on the concepts mentioned above.

Again, thank you for your commitment to public safety and the importance of E9-1-1.

Respectfully,

Willis Carter, President
APCO International

Ronald Boneau, President
NENA

August 20, 2008

The Honorable Kevin Martin
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: PS Docket 07-114

Dear Chairman Martin:

The Association of Public-Safety Communications Officials, International (APCO), the National Emergency Numbering Association (NENA), and Verizon Wireless submit this letter to propose improved compliance measurements for the Commission's wireless E911 location accuracy rules governing handset-based technologies. APCO, NENA and Verizon Wireless have worked together to develop technologically feasible compliance measurements that improve the ability of providers to locate customers making calls to 9-1-1 from wireless phones.

This letter outlines these proposed compliance measurements for handset-based technologies, and the undersigned parties agree that any location accuracy rules that the Commission adopts for carriers that employ handset-based solutions should be limited to the measures set out here. As referenced in APCO and NENA's July 14, 2008 letter to Chief Derek Poarch, these proposed rules would measure wireless 9-1-1 location accuracy at the county level. Furthermore, these proposed compliance measurements will ensure that over time the wireless industry will continue to improve accuracy levels as technology develops. These new rules would be as follows:

- Two years after the Commission adopts new rules, on a county-by-county basis, 67% of Phase II calls must be accurate to within 50 meters in all counties; 80% of Phase II calls must be accurate to within 150 meters in all counties, provided, however, that a carrier may exclude up to 15% of counties from the 150 meter requirement based upon heavy forestation that limits handset-based technology accuracy in those counties.
- Eight years after the Commission adopts new rules, on a county-by-county basis, 67% of Phase II calls must be accurate to within 50 meters in all counties; 90% of Phase II calls must be accurate to within 150 meters in all counties, provided, however, that a carrier may exclude up to 15% of counties from the 150 meter requirement based upon heavy forestation that limits handset-based technology accuracy in those counties.

In addition, Verizon Wireless, working with the wireless industry, APCO, and NENA, will continue good faith efforts to identify possible approaches for assessing wireless 9-1-1 location accuracy for calls originating indoors. Today, wireless calls are increasingly originating indoors and providers' ability to locate these 9-1-1 calls remains an important challenge. Accordingly, while indoor calls are a separate issue from the accuracy standards identified above, Verizon Wireless, APCO, and NENA agree to convene, within 180 days of the Commission's order, an industry group to evaluate methodologies for assessing wireless 9-1-1 location accuracy for calls originating indoors and report back to the Commission within one year.

Sincerely,



Brian Fontes
CEO
NENA



Robert M. Gurs
Director, Legal & Gov't Affairs
APCO



John T. Scott, III
VP & Deputy General Counsel
Verizon Wireless

cc: Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Jonathan Adelstein
Commissioner Deborah Taylor Tate
D. Gonzalez
A. Goldberger
A. Giancarlo
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B. Gottlieb
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August 21, 2008

Via Electronic Submission

The Honorable Kevin Martin
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex Parte Communication, PS Docket 07-114

Dear Chairman Martin:

On August 20, 2008, the Association of Public-Safety Communications Officials, International (APCO), the National Emergency Numbering Association (NENA), and Verizon Wireless filed a letter proposing improved compliance measurements for the Commission's wireless E911 location accuracy rules governing handset-based providers. As a handset-based carrier, Sprint Nextel Corporation ("Sprint") submits this letter in further support of that proposal.

The proposed accuracy standard meets the concerns of public safety while acknowledging the limitations of current technology. Although setting the accuracy standard at the county level will impose significant testing costs and require substantial time to complete, the accuracy standards articulated should be achievable. Sprint commends all those involved in the work required to produce this proposal and urges the Commission to adopt this compromise.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed. Please let me know if you have any questions regarding this filing.

Respectfully submitted,

/s/ Anna M. Gomez
Anna M. Gomez
Vice President, Federal and State Regulatory
Sprint Nextel Corporation

/s/ Lawrence R. Krevor
Lawrence R. Krevor
Vice President, Spectrum
Sprint Nextel Corporation

cc: Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Jonathan Adelstein
Commissioner Deborah Taylor Tate
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D. Poarch

August 25, 2008

The Honorable Kevin Martin
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: PS Docket 07-114

Dear Chairman Martin:

The Association of Public-Safety Communications Officials, International (APCO), the National Emergency Number Association (NENA), and AT&T Mobility (AT&T) submit this letter to propose improved compliance measurements for the Commission's wireless E911 location accuracy rules governing network-based technologies. APCO, NENA and AT&T have worked together to develop technologically feasible compliance measurements that improve the ability of providers to locate customers making calls to 9-1-1 from wireless phones.

This letter outlines these proposed compliance measurements for carriers using network-based technologies. As referenced in APCO and NENA's July 14, 2008 letter to Chief Derek Poarch, these proposed rules would measure wireless 9-1-1 location accuracy at the county level, but the undersigned parties also recognize that it is not technically feasible for carriers to meet the current accuracy standard in all counties using location accuracy technology currently available. Accordingly, the undersigned parties agree that any location accuracy rules that the Commission adopts for carriers that employ network-based solutions must be limited to the metrics and schedules set out here. These proposed compliance measurements will ensure that over time the wireless industry will continue to improve accuracy levels as technology develops.

As network-based providers will be unable to meet the new proposed county-level accuracy standards in all areas relying solely upon current network-based technology solutions, carriers who employ network-based location solutions may be expected to deploy handset-based solutions as an overlay to existing network-based solutions in order to meet the more stringent county-level requirements set forth below. To encourage the improvements in location accuracy that may be achieved using both network and handset based solutions, this proposal provides that network-based carriers may elect to use a system of blended reporting for their accuracy measurements, as defined below. Carriers

also may elect to report accuracy in any county based solely on the handset-based accuracy standards. The specifics of the proposal are as follows:

Accuracy Standards for Network-Based Location Solution Carriers:

67%/100M: 67 percent of all calls, measured at the county level, shall be located within 100 meters in each county by the end of year 5, in accordance with the interim benchmarks below; and

90%/300M: 90 percent of all calls, measured at the county level, shall be located within 300 meters in 85 percent of all counties by the end of year 8, in accordance with the interim benchmarks below.

Applicability of Accuracy Standards: The county-level location accuracy standards will be applicable to those counties, on an individual basis, for which a network-based carrier has deployed Phase II in at least one cell site located within a county's boundary. Compliance with the 67 percent standard and compliance with the 90 percent standard in a given county shall be measured and reported independently (i.e. the list of compliant counties for the 67 percent standard may be different than for the 90 percent standard).

Blended Reporting: Accuracy data from both a network-based solution and a handset-based solution may be blended to meet the network-based standard. Such blending shall be based on weighting accuracy data in the ratio of aGPS handsets to non-aGPS handsets in the carrier's subscriber base. The weighting ratio shall be applied to the accuracy data from each solution and measured against the network-based standards.

Example of blended reporting at 60% penetration of aGPS devices in the network:

Metric	Network-based Average	Handset-based Average	Blended Result
67%/100M	120M	40M	72M
90%/300M	400M	100M	220M

The blended results are derived by combining 40% of the network-based average with 60% of the handset-based average to produce a blended average for the county.

Network-Based Solution Compliance Benchmarks

67%/100M NETWORK-BASED ACCURACY STANDARD

End of Year 1¹: Carriers shall comply in 60% of counties, which counties shall cover at least 70% of the POPs covered by the carrier, network-wide. Compliance will be measured on a per county basis using existing network-based accuracy data.

¹ Benchmark intervals such as "Year 1" are to be measured from the effective date of any order adopting these proposed new location accuracy rules.

End of Year 3: Carriers shall comply in 70% of counties, which counties shall cover at least 80% of the POPs covered by the carrier, network-wide. Compliance will be measured on a per county basis, using, at the carrier's election, either: (i) network-based accuracy data; or (ii) blended reporting.

End of Year 5: Carriers shall comply in 100% of counties. Compliance will be measured on a per county basis, using, at the carrier's election, either: (i) network-based accuracy data; (ii) blended reporting; or (iii) subject to the following caveat, solely handset-based accuracy data (at handset-based accuracy standards).

A carrier may rely solely on handset-based accuracy data in any county if at least 95% of its subscribers, network-wide, use an aGPS handset, or if it offers subscribers in that county who do not have an aGPS device an aGPS handset at no cost to the subscriber.

90%/300M NETWORK-BASED ACCURACY STANDARD

End of Year 3: Carriers shall comply in 60% of counties, which counties shall cover at least 70% of the POPs covered by the carrier, network-wide. Compliance will be measured on a per county basis using, at the carrier's election, either: (i) network-based accuracy data; or (ii) blended reporting.

End of Year 5: Carriers shall comply in 70% of counties, which counties shall cover at least 80% of the POPs covered by the carrier, network-wide. Compliance will be measured on a per county basis using, at the carrier's election, either: (i) network-based accuracy data; or (ii) blended reporting.

End of Year 8: Carriers shall comply in 85% of counties. Compliance will be measured on a per county basis using, at the carrier's election, either: (i) network-based accuracy data; (ii) blended reporting; or (iii) subject to the caveat above, solely handset-based accuracy data (at handset-based accuracy standards).

ETAG: An ETAG (E911 Technical Advisory Group) shall be established to work with the E911 community to address open issues within this framework (e.g., updated outdoor and indoor accuracy measurement methodologies, tactics for improving accuracy performance in challenged areas, testing of emerging technology claims, E911 responsibilities in an open-access environment, the development of hybrid network-AGPS technologies, etc.).

Confidence and Uncertainty: Confidence and uncertainty data shall be provided on a per call basis upon PSAP request. This requirement shall begin at the end of Year 2, to allow testing to establish baseline confidence and uncertainty levels at the county level. Once a carrier has established baseline confidence and uncertainty levels in a county, ongoing accuracy shall be monitored based on the trending of uncertainty data and additional testing shall not be required.

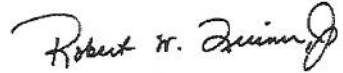
Sincerely,



Brian Fontes
CEO
NENA



Robert M. Gurs
Director, Legal & Gov't Affairs
APCO



Robert W. Quinn, Jr.
SVP – Federal Regulatory
AT&T

cc: Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Jonathan Adelstein
Commissioner Deborah Taylor Tate
D. Gonzalez
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Joan Marsh
Vice President –
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September 5, 2008

VIA ELECTRONIC FILING

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

Re: **In the Matter of Wireless E911 Location Accuracy Requirements
(PS Docket No. 07-114; CC Docket No. 94-102)**

Dear Mr. Dortch,

On August 25, 2008, AT&T filed a joint letter with APCO and NENA to outline a proposal for improved compliance measurements for the Commission's wireless E911 location accuracy rules governing network-based technologies. This letter supplements that filing with additional detail on the location accuracy challenges inherent in a network-based technology solution and how those challenges can be met through the deployment of assisted global positioning system ("aGPS") devices.

Achieving meaningful network-wide accuracy performance improvements in any existing network-based E911 location system is a significant challenge, due largely to the following three factors:

- Variations in cell site density,
- Impact of local topography on RF propagation, and
- Existing network designs.

Looking first at cell site density, the accuracy performance of a network-based E911 solution generally improves as the number of cell sites in the targeted area increases. This fact -- a fundamental premise of all network-based E911 solutions -- stems from the ability of the location technology to obtain more location measurements (time based measurements for UTDOA) from different location measurement units deployed at individual cell sites that "see" the uplink signals from the 911-calling handset. While a network-based solution is often referred to as being based on "triangulation," individual locates within 300m of a 911 caller's actual location are often based on data from as many as ten or more cell sites. Accordingly, network-based E911 location performance will generally be more accurate in urban and suburban areas, with

their higher cell site density, than the same system operating in a rural district, where there are fewer cell sites needed for commercial service due to lower call volumes.

Local topography also plays an important role in accuracy measurements. Local terrain features -- both natural (e.g., mountains, dense forestation, lakes, valleys) and manmade (e.g., buildings, etc.) -- degrade network-based E911 accuracy performance by reducing the number of cell sites that can generate location data. For example, due to topographically-induced variations in RF propagation, a network-based E911 location technology used in a flat rural or suburban area will generally outperform the same location system used in a mountainous area, even where the cell site density in the two areas is similar.

Finally, network design also impacts E911 location accuracy. A carrier has to consider many factors when making decisions about the number of cell sites deployed in any given service territory, which are based on current and future caller usage patterns, local zoning restrictions, local community acceptance, and economics. The resulting number and pattern of deployed cell sites will directly affect E911 accuracy performance for network-based systems. Examples of specific circumstances that present challenges include:

- A so-called “string of pearls” deployment along a desert or rural freeway, in which cell sites are built only in the freeway’s immediate vicinity so as to serve travelers along that highway,
- A “coverage island”, where a carrier builds coverage to serve a particular location (e.g., ski area, etc.) but does not initiate service elsewhere, and
- “Border areas” created along the RF boundaries of existing service areas.

In addition, location accuracy is affected by the position of the cell sites and their attendant location measurement units in relation to each other. If the geometric spacing is optimal, then a minimum of three sites can be used to triangulate for a good location estimate. If the geometric spacing is poor, then significantly more cell sites are necessary to get a good location estimate. Unfortunately, local zoning restrictions often limit the ability for carriers to deploy cell sites in an optimal geometric spacing.

Each of these situations presents accuracy challenges to a network-based E911 solution. In some areas, one or more of these factors render the achievement of the current network-based location standards infeasible at the county level. In many instances, these challenges can be mitigated or overcome through the deployment of aGPS technology. Accordingly, using both network-based and handset-based E911 technologies in concert will allow all carriers over time to significantly improve E911 accuracy performance across the majority of service areas.

An aGPS-equipped handset is very much like a stand-alone global positioning device that measures the signals from satellites to calculate locations using triangulation techniques. However, unlike a stand-alone GPS receiver, the aGPS handset also receives assistance data from the serving carrier’s network, allowing it to calculate location

estimates much faster than a pure GPS device. Initial deployment of aGPS technology requires that both consumer handsets and network components be upgraded. Handsets must have a GPS chipset and antenna, along with the software necessary to receive location assistance data from the serving carrier's network. Components in the serving network must also be enhanced so as to facilitate the delivery of relevant location assistance data. However, once those handset and network improvements have been completed, aGPS technology will, in many environments, provide significantly-improved accuracy performance, so long as a sufficient number of GPS satellites can be received by the handset. Of course, due to line of sight obstructions, local topography can also prevent aGPS location systems from achieving current handset-based location accuracy standards in many counties.

The joint proposal submitted on August 25, 2008 by AT&T, APCO, and NENA recognizes the benefits and shortcomings of both network and handset E911 location technologies, and outlines an achievable path to materially-improved E911 accuracy for the nation's wireless users. First, by measuring E911 accuracy performance at the county level, public safety officials and carriers alike will be able to evaluate E911 system performance using an agreed-upon geographic standard. Next, revised accuracy standards for both network and handset solutions acknowledge that improving E911 system performance will be a significant challenge across many of the diverse RF environments found in carriers' service areas. The delivery of confidence and uncertainty data on a per-call basis will markedly improve 911 call takers' ability to assess the validity of each call's location information and deploy public safety resources accordingly.

In addition, the use of a "blended" E911 accuracy measurement standard will mean that more and more consumers will reap the benefits of both handset and network technologies as the proposed compliance period progresses. Over time, in areas where one E911 location technology has certain inherent weaknesses, the strengths of the other technology may be leveraged, thereby continuing to improve first responders' ability to locate those in need of emergency services. This overlay approach recognizes both the benefits of current E911 systems and the technology investments made over the past decade by wireless carriers, while acknowledging and advancing the important public interest in improved E911 location accuracy.

In accordance with Commission rules, this letter is being filed electronically with your office for inclusion in the public record.

Sincerely,

A handwritten signature in black ink, appearing to be 'Joan Marsh', written over a horizontal line.

Joan Marsh

cc: Derek Poarch
Jeff Cohen

John T. Scott, III
Vice President &
Deputy General Counsel
Regulatory Law



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September 5, 2008

Ex Parte

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

Re: Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114

Dear Ms. Dortch:

On August 20, 2008, the Association of Public Safety Communications Officials, International (APCO), the National Emergency Numbering Association (NENA), and Verizon Wireless filed a letter with the Commission proposing improved compliance measurements for wireless providers using handset-based E911 technologies. This letter submits additional information in support of that proposal.

The proposal has five interrelated aspects: (1) new E911 accuracy standards that will be measured at the county level; (2) deadlines for achieving these standards; (3) an exception for a subset of counties that present technical challenges to location accuracy; (4) a commitment to work toward recommendations on indoor accuracy testing, and (5) agreement that the Commission should go no farther than adopting these new standards in amending its current E911 rules for handset-based technologies.

Verizon Wireless believes that the proposed accuracy standards, while rigorous, can be achieved within the time frames set forth in the proposal. In the company's experience, the greatest technical barrier to the accuracy of handset-based E911 technologies is the presence of terrain obstructions, whether natural or manmade. The "topology" (or terrain characteristics) of an area is critically important to accuracy because the precision of the location fix depends on the wireless handset's ability to "see" multiple Global Positioning System (GPS) satellites. In Verizon Wireless's hybrid Assisted GPS location system,¹ four or more satellites are required for a precise GPS-

¹ Verizon Wireless's system uses a "hybrid" technology known as "Assisted GPS", because it supplements GPS technology with network-based network triangulation technology. The network-based technology, however, does not provide accuracy to within the precise distance limits the Commission previously set for handset-based technology.

only location. When there are not enough satellites visible to the handset due to line of sight obstructions, then the location system relies on data from surrounding cell sites to supplement or completely replace satellite signals in calculating location measurements. When cell sites are used to supplement or substitute for satellite measurements, the handset must be able to “see” a minimum of three cell sites that are geometrically spaced in a manner that allows for triangulation, much like the network-based E911 solutions deployed by other carriers. Location measurements become less accurate as more reliance is placed on cell site triangulation.

Where, for example, an area’s topology is characterized by forest, the likelihood of a good location fix is reduced because the tree cover obstructs the transmission path between the satellites and the handset. The more extensive the tree cover, the greater difficulty the system has in generating a GPS-based fix. Likewise, man-made as well as natural obstructions may also pose challenges for obtaining an accurate network-based fix because RF signals may be delayed or blocked altogether. In contrast, where an area is more open so that it is more likely that sufficient GPS satellites will be accessed by the handset, handset-based technologies provide highly accurate location fixes.

In short, while meeting E911 accuracy requirements at the county level is feasible in many counties, the parties to the proposal recognized that it is not technically feasible for carriers to meet the current accuracy standards in all counties using currently available technology. Any new E911 rule for handset-based systems must recognize these realities in order to be technically achievable.

The APCO-NENA-Verizon Wireless proposal incorporates these technical realities in two ways. First, in recognition that accuracy will now be tested and measured at an individual county level, it sets the percentage of Phase 2 E911 calls that must be accurate to within 50 meters at 67%, and the percentage of calls that must be accurate to within 150 meters at 80%, within two years from the effective date of the new rules. No more than six years later (that is, eight years after the rules’ effective date), the percentage of Phase 2 calls that must be accurate to within 150 meters increases to 90%, thus raising over time the required accuracy of the system.

Second, the proposal allows the wireless provider to exclude up to 15% of counties served from the 150 meter accuracy standard based on heavy forestation, to reflect the fact that many counties are characterized by tree coverage that reduces the ability to obtain sufficient accuracy to establish compliance.

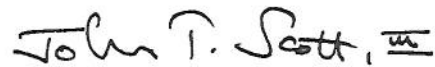
By excluding a small percentage of counties, as well as a small (and decreasing) percentage of calls from compliance, the proposal acknowledges that these exceptions are both necessary and appropriate in order to achieve the rigorous accuracy requirements that will apply to all other E911 Phase 2 calls.

The compliance periods set forth in the proposal serve two important purposes. The initial two-year period is necessary for Verizon Wireless to establish new protocols for county-level accuracy testing and to conduct that testing in order to verify compliance

with the new standards. The additional six-year period is needed for Verizon Wireless to work to achieve the more rigorous "90% of Phase 2 calls" accuracy standard. The company anticipates that during this time there are likely to be developments in the field of location technologies that may enable improvements in accuracy of handset-based technologies. This period will allow the company needed time to test and deploy new software or equipment using such technologies.

The APCO-NENA-Verizon Wireless proposal addresses Public Safety's desire for wireless E911 systems to demonstrate accuracy at an individual county level, while incorporating a limited but needed amount of flexibility for wireless carriers using handset-based technologies to meet the accuracy standards. The company believes that this proposal is feasible and achievable as long as it is adopted as a whole and without additional requirements. It thus encourages the Commission to consider it at such time as the Commission resumes its consideration of changes to its E911 accuracy rules.

Sincerely,

A handwritten signature in black ink that reads "John T. Scott, III". The signature is written in a cursive style with a horizontal line under the name.

John T. Scott, III

cc: Derek Poarch, Chief, Public Safety and Homeland Security Bureau
Jeffrey Cohen, Public Safety and Homeland Security Bureau
Brian Fontes, NENA
Robert Gurss, APCO



September 9, 2008

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

RE: PS Docket 07-114 and CC Docket 94-102

Dear Ms. Dortch:

The Association of Public-Safety Communications Officials-International (“APCO”) and the National Emergency Number Association (“NENA”) wish to take this opportunity to address the recent letters from Verizon Wireless and AT&T Mobility regarding their proposals for revisions to the E9-1-1 wireless location accuracy rules, as set forth in our prior joint letters with each company.

APCO and NENA agree that these proposals will promote the public interest and should be adopted by the Commission. Significantly, Verizon and AT&T have both agreed that location accuracy should be measured at the county level. This represents a substantial improvement over the measurement areas currently used by carriers and the positions they had previously advocated. As we described in our letter of July 14, 2008, county-level accuracy would in many cases be identical to PSAP-level accuracy. Counties also are more easily defined than PSAPs and are not prone to administrative boundary changes.

The joint proposals, if adopted by the Commission, also could bring an end to years of distracting debates regarding the appropriate accuracy standards. All parties will then be able to focus attention on the important, critical task of implementing and improving wireless E9-1-1 capabilities.

We also believe that the specific standards identified in the letters present a sensible approach that will achieve improved accuracy in a reasonable time frame. Most importantly, the requirements for 67% of 9-1-1 calls (50/100 meters) will be met at the county level within two years for Verizon and five years for AT&T, consistent with the five-year benchmark that APCO and NENA had previously recommended and was adopted in the last FCC order. Also, we are pleased that AT&T proposes to combine handset and network based technologies to provide improved accuracy across a variety of geographic settings.

The carriers have also agreed to provide confidence and uncertainty data on a per call basis upon receiving PSAP requests. This will greatly improve the ability of PSAPs to utilize accuracy data and manage their 9-1-1 calls. Finally, we look forward to working with the carriers to develop approaches for assessing indoor call accuracy, as wireless phones are increasingly being used to make 9-1-1 calls from inside homes and offices. Location accuracy is especially important in those settings where first responders may have difficulty locating the exact site of the emergency.

Please contact the undersigned should the Commission require any additional information.

Respectfully submitted,

/s/

Robert M. Gurss
Director, Legal and Government Affairs
APCO International
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/s/

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cc: Derek Poarch
Jeff Cohen
John T. Scott, III
Joan Marsh