

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. Gurss  
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  
W. Leighton  
B. Gottlieb  
R. Crittendon  
D. Poarch