



July 9, 2020

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Re: Notice of *Ex Parte*, PS Docket No. 07-114

On July 9, 2020, the undersigned spoke by phone with Will Adams, Legal Advisor, of Commissioner Carr's office concerning the above-captioned proceeding.

Mr. Cohen described the concerns APCO expressed in a recent *ex parte* submission.¹ Mr. Cohen pointed out that the draft Order contains a major loophole that if left unaddressed would cause the Order to not lead to the intended results. As crafted, a wireless carrier that provides dispatchable location for some calls, as Verizon has noted it does, is already in compliance with the draft rules. A carrier such as Verizon need not ever deploy a z-axis solution and has no specific obligation for how many calls must be delivered with dispatchable location to be compliant.

Mr. Cohen explained that the remedy for this loophole is for the Commission to adopt new benchmarks governing the provision of dispatchable location to replace the now defunct rules that had been specific to the abandoned NEAD-based approach. Such benchmarks could ensure that carriers electing to comply by providing dispatchable location in lieu of z-axis information provide these locations with a meaningful percentage of wireless 9-1-1 calls.

Mr. Cohen added that as noted in APCO's filings in this proceeding, the Commission could establish a minimum percentage of calls that would need to be delivered with dispatchable location at the 2021 and subsequent benchmarks. As early as 2014, the major wireless carriers had already agreed to provide dispatchable location using their own in-home wireless products.²

¹ Letter from Jeffrey S. Cohen, Chief Counsel, APCO International, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114 (filed July 7, 2020).

² See Letter, John Wright, APCO International; Charles W. McKee, Sprint Corporation; Joan Marsh, AT&T Services, Inc.; Kathleen O'Brien Ham, T-Mobile USA, Inc.; Christy Williams, National Emergency Number Association; Kathleen Grillo, Verizon Wireless, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket No. 07-114 (filed Nov. 18, 2014), Attachment at 4 (Nov. 18, 2014) ("To the extent that a carrier plans to introduce

With increasing news of carriers deploying in-home and in-office 5G-based fixed wireless products, the carriers could similarly provide dispatchable location associated with these technologies. Further, the Commission should require wireless providers to execute business arrangements with each other and with other companies that offer in-home and in-business products and services including Wi-Fi to leverage address information in the same manner. The wireless carriers already contemplated agreements among themselves when pursuing the NEAD. And the Commission already expects wireless carriers to establish any needed arrangements with handset manufacturers to meet the z-axis requirements.

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

Respectfully submitted,

APCO INTERNATIONAL

By:

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CC (via email):

Will Adams

new wireless consumer home products, such carrier agrees to introduce such products that will provide dispatchable location”).