

Having read Mr. Hatfield's report I have only one minor technical quibble. The process of determining location by measurement of multiple distances is known as "trilateration", not "triangulation". GPS and OTD systems trilaterate (or multilaterate) to determine location.

I feel that the proper conclusion to be drawn from Mr. Hatfield's report is that the implementation of wireless E911 is a complex, multi-faceted problem. It may be appropriate to implement the solution in more than two phases using variable standards of accuracy. For instance, in a rural setting a lower accuracy (e.g. $\pm 500\text{m}$) may be adequate to locate most emergency callers, whereas the same accuracy would clearly be inadequate in an urban or suburban area. Since it seems to be more technically challenging for rural carriers to meet the existing accuracy requirements, it would appear reasonable to relax the standard in rural areas, at least in the near-term. As the technology follows its natural progression, future systems will surely provide more accurate locational services. As rural wireless systems upgrade, the standards of accuracy can be tightened.

The bottom line is that the Commission should mandate what can be economically accomplished now, while requiring progress toward the desired goal. Ride the technological wave; don't try to drive it.