



FCC Voted to Adopt New Items on GPS, NG911 and 911 Location Accuracy at Its March 27 Open Meeting

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The Federal Communications Commission (FCC) held its March Open Meeting last Thursday, March 27, during which it voted to adopt the three items discussed in our [last blog post](#) and recent [client alert](#): (1) a Notice of Inquiry (NOI) exploring alternatives to Global Positioning Technology (GPS), (2) a Further Notice of Proposed Rulemaking (FNPRM) containing proposals to ensure the reliability and interoperability of Next Generation 911 (NG911) networks, and (3) an FNPRM seeking comment on proposals to strengthen caller location accuracy requirements for wireless calls to 911. The final versions of these documents reflected several changes from the drafts that were circulated in early March, as detailed below:

- **Exploring Alternatives to GPS (WT Docket No. 25-110)**. The final draft of the GPS NOI included several changes, largely made in response to *ex parte* feedback from various parties who weighed in after the release of the initial draft. This included new language addressing the implications of radio frequency interference from Positioning, Navigation, and Timing (PNT) technology, as requested in *ex parte* filings by the International Bridge, Tunnel & Turnpike Association, Neology, and Avery Dennison. Notably [NextNav Inc. \(NextNav\)](#) filed an *ex parte* opposing the inclusion of this line of questioning in the NOI, arguing that this would be better addressed in the separate ongoing proceeding related to NextNav's petition for rulemaking on the lower 900 megahertz (MHz). The FCC incorporated a separate request from NextNav, seeking comment on how to mitigate the interference posed by PNT technology. Other additions to the NOI included questions related to the interoperability of PNT technology with existing technologies, and the resiliency of PNT technology to

interference and jamming. The FCC also included a new question regarding the viability of both low Earth orbit (LEO) and geostationary Earth orbit (GEO) satellites to provide PNT services and data in response to an ex parte letter from satellite company, Higher Ground, LLC.

- **Ensuring NG911 Resiliency, Reliability, Interoperability, and Accessibility (PS Docket Nos. 21-479, 13-75)**. The final draft of the NG911 FNPRM adopted on Thursday was largely unchanged from the draft circulated earlier in March, with a couple minor tweaks. These included new questions about (1) “Covered 911 Service Providers” (CSPs) and whether they should be treated differently from telecommunications carriers, and (2) the efficiencies that three-way video and Direct Video Calling (DVC) could achieve for Public Safety Answering Points (PSAPs) in NG911 systems. At the request of Commissioner Ana Gomez, the final draft also includes new language seeking comment on whether the FCC should establish a dedicated portal for consumers to file 911 outage complaints.
- **Strengthening 911 Location Accuracy Rules (PS Docket No. 07-114)**. The final version of the FNPRM seeks comment on several new questions, which appear to have been prompted by ex parte feedback from the Cellular Telephone Industries Association (CTIA) following the release of the draft item. Specifically, the final draft includes a question seeking comment on how PSAPs use the vertical location information that is being provided today, whether they have found it to be useful, whether they have observed limitations with this information, and the extent to which PSAPs require NENA 3D location guidelines or other mechanisms to help operationalize this information. The final draft also includes questions about converting Height Above Ellipsoid (HAE) values, which are currently used for the Z-axis component of coordinate-based location information provided to PSAPs with wireless 911 calls, to Height Above Ground Level (HAGL), which CTIA suggested may be more actionable for first responders. Finally, the item includes additional new questions about the use of an industry test bed to validate the accuracy of location technology.

Comments and reply comments will be due 45 days and 75 days, respectively, from the date of each item’s publication in the Federal Register.

The Commission also voted to issue a Memorandum Opinion and Order, reversing a Media Bureau decision and reinstating the construction permit of FM Translator Station K29DF in Pineville, Louisiana, licensed to Radio Two, LLC.

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