



October 2nd, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Puerto Rico Telephone Company, Inc., E911 Location Accuracy Compliance Certification, PS Docket No. 17-78

Dear Ms. Dortch:

Pursuant to Section 20.18(i)(2)(iii) of the Commission's Rules, please find attached Puerto Rico Telephone Company, Inc., d/b/a Claro ("CLARO"), certificate of compliance with the Year 3 E911 vertical location accuracy benchmark for CMRS providers, Section 20.18(i)(2)(ii)(A).

Please contact the undersigned should you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Carlos D. Ruiz Mantilla", written over a horizontal line.

Carlos D. Ruiz Mantilla
Regulatory Compliance Manager
Puerto Rico Telephone Company, Inc.
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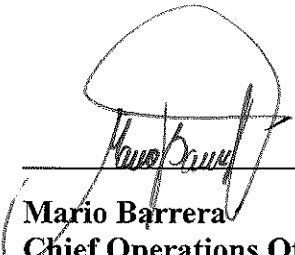
PUERTO RICO TELEPHONE COMPANY, INC. d/b/a CLARO
E911 Location Accuracy Benchmark
PS Docket No. 17-78

CERTIFICATION

I, Mario Barrera, certify that I am Chief Operations Officer of Puerto Rico Telephone Company, Inc. d/b/a Claro ("Claro") and that I am familiar with and responsible for the Company's E911 indoor location accuracy compliance, as set forth in 47 C.F.R. §§ 20.18(i) of the rules of the Federal Communications Commission ("Commission").

As of August 3, 2018, Claro does not provide service or report live call data in one or more of the test cities and has deployed the indoor location technology or technologies used in its networks consistently with the manner in which such technologies have been tested in the test bed. Additionally, as of August 3, 2018, and to Claro's best knowledge, none of the handsets offered has the capability to deliver uncompensated barometric sensor information over Claro's 2G and/or 3G networks to the PSAPs.¹

PRTC represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. PRTC also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Mario Barrera
Chief Operations Officer
Puerto Rico Telephone Company, Inc., d/b/a Claro

October 2, 2018

¹ See Wireless E911 Location Accuracy Requirements, Fourth Report and Order, PS Docket No. 07-114, 30 FCC Rcd 1259, ¶ 115 (2015) (stating that the requirement to deliver UBP data to PSAPs "applies only to devices with barometric sensors and delivery capability that the CMRS provider may choose to offer to consumers and does not require any CMRS provider to make such devices available to subscribers.").

