

8300 Greensboro Dr.
Suite 1200
Tysons, VA 22102

(703) 584-8678
WWW.FCCLAW.COM



April 12, 2018

Michael Wilhelm, Acting Division Chief
Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: PS Docket No. 17-78
E911 Location Accuracy Compliance Certification
Cellular Network Partnership, An Oklahoma Limited Partnership
d/b/a Pioneer Cellular

Dear Mr. Wilhelm:

Pursuant to 47 C.F.R. § 20.18(i)(2)(iii)(C) and FCC Public Notice, DA 18-323, released March 30, 2018, transmitted herewith on behalf of Cellular Network Partnership, An Oklahoma Limited Partnership d/b/a Pioneer Cellular is a certificate of compliance with the location accuracy standards of 47 C.F.R. § 20.18(i)(2)(i)(B)(2), namely, dispatchable location or x/y location within 50 meters for 50 percent of all wireless 911 calls. Pioneer Cellular is a non-nationwide Commercial Mobile Radio Service provider that does not provide service or report quarterly live call data in any of the six Test Cities.

Should the Commission require additional information, it is welcome to contact the undersigned.

Very truly yours,

A handwritten signature in blue ink that reads "Pamela L. Gist". The signature is written in a cursive, flowing style.

Pamela L. Gist

E911 Location Accuracy Compliance Certification
47 C.F.R. § 20.18(i)(2)(iii)
PS Docket No. 17-78

Cellular Network Partnership, An Oklahoma Limited Partnership
d/b/a Pioneer Cellular
P.O. Box 539
Kingfisher, Oklahoma 73750

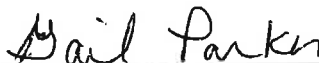
CERTIFICATION

I, Gail Parker, President of a General Partner of Cellular Network Partnership, An Oklahoma Limited Partnership d/b/a Pioneer Cellular, hereby certify that I am familiar with and have responsibility for the company's indoor location accuracy compliance, as set forth in 47 C.F.R. §§ 20.18(i) of the rules of the Federal Communications Commission.

As of April 3, 2018,

- (1) Pioneer Cellular does not provide service or report live call data in one or more of the Test Cities,
- (2) Pioneer Cellular is providing dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls,
- (3) Pioneer Cellular 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, and
- (4) Pioneer Cellular has verified based on its own live call data that it is in compliance with the three-year benchmark set forth at 47 CFR § 20.18(i)(2)(i)(B)(2).

Pioneer Cellular 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. Pioneer Cellular 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.



Gail Parker, President of O. T. & T. Communications, Inc.,
a General Partner of Cellular Network Partnership,
An Oklahoma Limited Partnership d/b/a Pioneer Cellular

Date: 4-11-18