

May 16, 2018

FILED VIA ECFS

Michael Wilhelm, 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
East Kentucky Network, LLC d/b/a Appalachian Wireless

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, please find attached a certificate of compliance filed on behalf of East Kentucky Network, LLC d/b/a Appalachian Wireless ("EKN"), verifying that EKN is in compliance with the location accuracy standards of 47 C.F.R. § 20.18(i)(2)(i)(B)(2). EKN is a non-nationwide provider that does not provide service or report quarterly live call data in any of the six Test Cities.

Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Cindy D. McCarty
In-House Counsel
(606) 339-1006
cmccarty@ekn.com

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

East Kentucky Network, LLC
101 Technology Trail
Ivel, Kentucky 41642

CERTIFICATION

I, W.A. Gillum, hereby certify that I am the CEO and General Manager of East Kentucky Network, LLC d/b/a Appalachian Wireless (EKN), and 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) EKN does not provide service or report live call data in one or more of the Test Cities,
- (2) EKN is providing dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls,
- (3) EKN 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) EKN 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).

EKN 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. EKN 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.

W A Gillum

W.A. Gillum
CEO/General Manager

Date: 5/16/2018