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May 18, 2017

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Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Custer Telephone Cooperative, Inc.
E911 Location Accuracy Certification, PS Docket No. 17-78

Dear Ms. Dortch:

Custer Telephone Cooperative, Inc., by its counsel and pursuant to instructions set forth in FCC Public Notice, *Public Safety and Homeland Security Bureau Provides Guidance to CMRS Providers Regarding Certification of Compliance with E911 Location Accuracy Requirements*, PS Docket Nos. 07-114 and 07-78, DA 17-306 (*rel*. March 30, 2017), hereby submits the Year 2 initial certification required pursuant to Section 20.18(i)(2)(iii)(C) of the Commission's Rules.

Please contact the undersigned counsel should you have any questions.

Very truly yours,

D. Cary Mitchell
Counsel for Custer Telephone Cooperative, Inc.

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

Custer Telephone Cooperative, Inc.
PO Box 324
1101 East Main Avenue
Challis, ID 83226

CERTIFICATION

I, Dennis Thornock, hereby certify that I am CEO and General Manager of Custer Telephone Cooperative, Inc. (the Company) and that I am familiar with and have responsibility for the company's indoor location accuracy compliance, as set forth in Section 20.18(i) of the rules of the Federal Communications Commission.

As of April 3, 2017,

1) The Company does not provide service or report live call data in one or more of the Test Cities,

2) The Company is providing dispatchable location or x/y location information within 50 meters for 40 percent of all wireless 911 calls,

3) The Company has deployed the indoor location technology or technologies used in its networks consistent with the manner in which such technologies have been tested in the test bed, and

4) The Company has verified based on its own live call data that it is in compliance with the two-year benchmark set forth at 47 CFR § 20.18(i)(2)(i)(B)(1).

Dennis L Thornock

Dennis L Thornock
CEO and General Manager

5/18/2017
Date