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May 23, 2018

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

Re: PS Docket No. 17-78  
E911 Location Accuracy Compliance Certification  
Bluegrass Cellular, Inc.

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 Bluegrass Cellular, Inc. 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. Bluegrass 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,



Pamela L. Gist

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

Bluegrass Cellular, Inc.  
P.O. Box 5012  
Elizabethtown, Kentucky 42702-5012

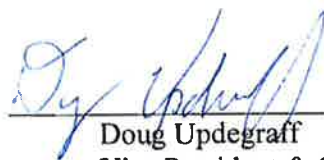
**CERTIFICATION**

I, Doug Updegraff, hereby certify that I am an officer of Bluegrass Cellular, Inc. (BCI), 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) BCI does not provide service or report live call data in one or more of the Test Cities,
- (2) BCI is providing dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls,
- (3) BCI 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) BCI 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).

BCI 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. BCI 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.



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Doug Updegraff  
Vice President & Chief Technology Officer

Date: