



May 31, 2018

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**Re:** E911 Location Accuracy Compliance Certification – PS Docket No. 17-78

Dear Ms. Dortch:

Attached is the E911 Location Accuracy Compliance Certification of TracFone Wireless Inc.

You may reach me at (305) 715-3613 or [sathanson@tracfone.com](mailto:sathanson@tracfone.com) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Athanson", written in a cursive style.

Stephen Athanson  
Regulatory Counsel

Enc.

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

TracFone Wireless, Inc.  
9700 N.W. 112th Avenue  
Miami, FL 33178

**CERTIFICATION**

I, Richard Salzman, hereby certify that I am an officer of TracFone Wireless, Inc. ("TracFone") and that I am familiar with and have responsibility for TracFone's indoor location accuracy compliance, as set forth in Section 20.18(i) of the Federal Communications Commission's Rules (47 C.F.R. § 20.18(i)).

TracFone is a Commercial Mobile Radio Service ("CMRS") provider that offers voice service to consumers by purchasing airtime or capacity at wholesale rates from CMRS licensees, *i.e.*, TracFone is a reseller. As such, TracFone is subject to Section 20.18(i) of the Commission's Rules. As a reseller, TracFone relies on its underlying carriers to provide the networks and facilities necessary to provide telecommunications services and to ensure that those services comply with wireless E911 location accuracy requirements set forth in Section 20.18(i) of the Commission's Rules.

TracFone has contacted each of its underlying carriers regarding compliance with the Commission's E911 location accuracy requirements. Each underlying carrier has represented to TracFone that it is in compliance with the Commission's E911 location accuracy requirements.

I certify under penalty of perjury that the foregoing is true and correct.

  
Richard Salzman  
EVP – General Counsel  
May 24, 2018