



May 30<sup>th</sup>, 2018

VIA ECFS

Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, NW  
Washington, DC 20554

Re: Certifying Compliance with Location Accuracy Three-Year Benchmark, PS Dkt. No. 17-78

To Whom it May Concern:

Pursuant to 47 C.F.R. § 20.18(i)(2)(iii),<sup>1</sup> GCI Communication Corp. ("GCI") certifies that, as of April 3, 2018, (1) it does not provide service or report live call data in one or more of the Test Cities, (2) it is providing dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls, (3) it 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,<sup>2</sup> and (4) it 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).

This Certification is executed by an officer or director of GCI who is familiar with and has responsibility for GCI's indoor location accuracy compliance.

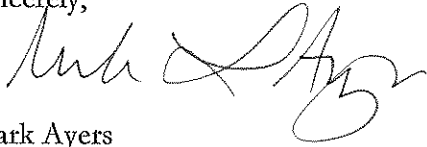
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<sup>1</sup> See also Public Safety And Homeland Security Bureau Provides Guidance To CMRS Providers Regarding Certification Of Compliance With E911 Location Accuracy Requirements, PS Dkt. No. 07-114, PS Dkt. No. 17-78 (Mar. 30, 2017).

<sup>2</sup> Polaris Wireless independently conducted indoor and outdoor E911 location accuracy testing of the Polaris WLS Hybrid Solution in Anchorage, Alaska as deployed in the 2G and 4G networks of The Alaska Wireless Network, a company wholly owned by GCI Communication Corp. ("GCI"). See Letter to Marlene H. Dortch, Notice of Ex Parte Presentation, PS Dkt. No. 07-114 (Dec. 3, 2015) (PSHSB suggested that Polaris implement parallel testing mechanisms for evaluating and certifying Polaris's E911 location solution because its 9-1-1 location technology is not currently deployed by any of the nationwide carriers in the Test Cities); Letter to Marlene H. Dortch, Wireless E-911 Location Accuracy Requirements, PS Dkt. No. 07-114 (Dec. 22, 2015) (agreeing that it is appropriate for Polaris' non-nationwide carrier customers to engage in testing in parallel with the Test Bed in order to evaluate whether the Polaris-deployed technology complies with the interim benchmarks).

Please direct any questions to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Ayers', with a stylized flourish at the end.

Mark Ayers  
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