

Holland & Knight

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June 4, 2018

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VIA IBFS ELECTRONIC SUBMISSION

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: United States Cellular Corporation (and its operating affiliates)
E911 Location Accuracy Compliance Certification
PS Docket No. 17-78

Dear Ms. Dortch:

On behalf of United States Cellular Corporation and its operating affiliates listed on Attachment A, is its certification of compliance with the location accuracy standards of 47. C.F.R. § 20.18(i)(2)(i)(B)(2).

Please direct any questions concerning this submission to the undersigned.

Respectfully submitted,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "Peter M. Connolly", with a long, sweeping horizontal stroke extending to the right.

Peter M. Connolly
Counsel for United States Cellular Corporation

47 C.F.R. § 20.18(i)(2)(i)(B)(2) Certification

PS Docket 17-78

Date filed: June 4, 2018

Name of company covered by this certification: United States Cellular Corporation and its affiliates listed in Attachment A


Name of signatory: Jeffrey Baenke

Title of signatory: Vice President – Technology Development

I, Jeffrey Baenke, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the FCC's indoor location accuracy requirements.

As of April 3, 2018, United States Cellular Corporation (USCC) did not provide service or report live call data in any of the Test Cities and continues not to do so. However, USCC is providing dispatchable location or x/y location information within 50 meters for at least 50 percent of all wireless 911 calls. USCC has also deployed indoor location technology used in its network consistently with the manner in which that technology was tested in the test bed. USCC has also verified, based on its own live call data, that its coverage is in compliance with the three year benchmark set forth at 47 C.F.R. 20.18(i)(2)(i)(B)(2).

The company 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.

Signed 

Jeffrey Baenke
Vice President – Technology Development
United States Cellular Corporation

Attachment A - Company Names and Filer ID

	Company Name	FEIN
802587	USCOC of Greater North Carolina, LLC	36-3779831
802608	California Rural Service Area #1, Inc.	39-1740935
802611	USCOC of Pennsylvania RSA #10-82, Inc.	39-1876663
802614	Hardy Cellular Telephone Company	31-1266169
802623	Vermont RSA No. 2-B2, Inc.	39-1737238
802626	Manchester-Nashua Cellular Telephone, L.P.	36-3982320
802641	USCOC of Greater Iowa, LLC	26-3769148
802644	Cedar Rapids Cellular Telephone, L.P.	36-3850690
802647	Bangor Cellular Telephone, LP	36-3880521
802685	USCOC of Cumberland, LLC.	36-3862875
802692	Kansas #15, LP	34-1675512
802704	USCOC of Lacrosse, LLC	36-3553841
802716	Tennessee RSA No. 3 Limited Partnership	62-1461122
802722	United States Cellular Operating Company of Knoxville	62-1147327
802731	USCOC of South Carolina RSA #4, Inc.	39-3811996
802737	Yakima MSA Limited Partnership	48-1066533
802743	Dubuque Cellular Telephone, L.P.	36-3880530
802746	Farmers Cellular Telephone Company, Inc.	42-1334334
802749	Iowa RSA No. 9 Limited Partnership	36-3668199
802755	Iowa RSA No. 12 Limited Partnership	36-3704891
802758	United States Cellular Operating Company of Medford	36-3584090
802761	McDaniel Cellular Telephone Company	93-0996859
802764	USCOC of Washington 4, Inc.	36-3645818
802767	Oregon RSA #2, Inc.	39-1669888
802779	Western Sub-RSA Limited Partnership	36-3804455
802785	USCOC of Oregon RSA #5, Inc.	39-1735612
802794	USCOC of Greater Missouri, LLC	36-3623765
802821	Indiana RSA No. 5 Limited Partnership	35-1805733
802824	Indiana RSA No. 4 Limited Partnership	35-1805731
802833	United States Cellular Telephone Company (Greater Knoxville), LP.	36-3332471
802849	Texahoma Cellular Limited Partnership	75-2494073
802851	NH #1 Rural Cellular, Inc.	36-3717952
802860	Maine RSA #1, Inc.	36-3717943
802863	USCOC of Greater Oklahoma, LLC	36-3811995
807699	USCOC of Virginia RSA #3, Inc.	72-1176997
817226	Madison Cellular Telephone Company	91-1387617
817230	Kenosha Cellular Telephone, L.P.	39-1757974
817232	Racine Cellular Telephone Company	91-1431833
818126	Jacksonville Cellular Telephone Company	56-1585202
818128	Wilmington Cellular Telephone Company	31-1221413
821504	USCOC of Richland, Inc.	36-4404449
821506	Maine RSA #4, Inc.	36-3717946
821508	United States Cellular Operating Company LLC	36-3363349
821600	USCOC of Central Illinois, LLC	68-0231012
823622	USCOC of Rochester, Inc.	54-2042835
825693	USCOC Nebraska/Kansas, LLC	20-3466461
827675	Carroll Wireless, LP	20-1914392
828729	Barat Wireless, LP	20-4824235