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& SACHS LLP

June 4, 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  
Carolina West Wireless, 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 Carolina West Wireless, 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. Carolina West Wireless 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,

A handwritten signature in black ink, appearing to read "Pamela L. Gist". The signature is fluid and cursive, with the first name "Pamela" and last name "Gist" clearly distinguishable.

Pamela L. Gist

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

Carolina West Wireless, Inc.  
P.O. Box 959  
Wilkesboro, NC 28697

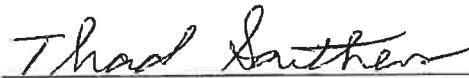
CERTIFICATION

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

CWW 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. The company 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.



Thad Southers  
Chief Financial Officer

Date: 6-4-2018