

June 28, 2018

Southern Communications Services, Inc.  
d/b/a Southern Linc  
5555 Glenridge Connector, Suite 500  
Atlanta, GA 30342

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: Southern Communications Services, Inc. d/b/a Southern Linc's Indoor Location Accuracy Initial Certification (PS Docket No. 17-78)**

Dear Ms. Dortch:

In accordance with the Federal Communications Commission's (the "Commission") Wireless E911 Location Accuracy Requirements adopted in the Commission's *Indoor Location Fourth Report and Order*, Southern Communications Services, Inc. d/b/a Southern Linc ("Southern Linc" or the "Company") hereby certifies that as of April 3, 2018:<sup>1</sup>

- (1) Southern Linc provides service and reports live call data from one of the six Test Cities;
- (2) Southern Linc is providing dispatchable location or x/y location information within 50 meters for at least 50 percent of all wireless 911 calls;
- (3) Southern Linc has deployed the indoor location technology used in its network consistently with the manner in which such technology has been tested in the test bed;<sup>2</sup> and

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<sup>1</sup> See *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, 30 FCC Rcd 1259 (2015) (*Indoor Location Fourth Report and Order*) and rules 47 CFR § 20.18(i) *et seq.*

<sup>2</sup> Southern Linc uses A-GPS location technology over its iDEN network which is provisioned as A-GPS over GSM by its 911 location services provider, West Safety Services. The 9-1-1 Location Technologies Test Bed, LLC ("Test Bed LLC") tested A-GPS over CDMA and UMTS. Test bed data for A-GPS over UMTS is being used as a reasonable proxy for A-GPS over GSM.

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- (4) Southern Linc's deployment of location technologies throughout its coverage area is consistent with its deployment of the same technologies in the areas that are used for live call data reporting.

Please contact my office at (678) 443-1500 if you have any questions.

Respectfully,

*/s/ Michael D. Rosenthal*

Michael D. Rosenthal  
Director, Legal & External Affairs  
Southern Linc