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E911 Location Accuracy Implementation Plan and Progress Report
47 C.F.R. § 20.18(i)(4)(i) and (ii)
PS Docket No. 07-114

Docomo Pacific, Inc. (Docomo) is a non-nationwide provider of Commercial Mobile Radio Services (CMRS). Set forth below is Docomo's progress toward meeting compliance deadlines prescribed by the Federal Communications Commission in *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, PS Docket No. 07-114, FCC 15-9 (released Fed. 3, 2015) (*Fourth Report and Order*), and codified in 47 C.F.R. § 20.18(i), *et seq.* Also provided is Docomo's Implementation Plan for meeting the Commission's indoor location accuracy requirements.

Progress Report

Docomo diligently maintains knowledge of the location accuracy rules and investigates technical requirements necessary to provide public safety with accurate location data for emergency callers. To date, however, no Public Safety Answering Point (PSAP) in Docomo's service area, Guam and the Northern Mariana Islands, has requested or become capable of receiving or utilizing indoor location data or Phase II Enhanced 911 (E911) location data.

On March 30, 2017 Docomo submitted to the Commission a request for waiver of 47 C.F.R. § 20.18(i) "Indoor location accuracy for 911" Rules and associated testing and reporting requirements because Docomo's service area includes no PSAPs capable of receiving or using E911 or indoor location data.

In its waiver request, Docomo believes it demonstrates that the underlying purpose of 47 C.F.R. § 20.18(i) is not served by requiring it to implement technical capability to supply E911 location information to public safety authorities that are incapable of receiving and processing the information. Likewise, in accordance with 47 C.F.R. § 20.18(m)(1), Docomo believes it is not required to support Phase II location under 47 C.F.R. §§ 20.18(e)-(h) due to the lack of PSAP Phase II capability to receive the enhanced location information. Therefore, without a PSAP in its service area that has requested or become capable of receiving or utilizing 911 call location data, Docomo is unable to fulfill the location accuracy requirements of 47 C.F.R. § 20.18(i)(2)(i)(B)(1).

Implementation Plan

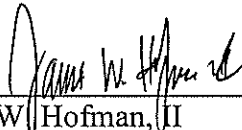
Docomo's compliance with FCC indoor location accuracy requirements of 47 CFR § 20.18, including subsections (i)(2)(i) and (i)(2)(ii), *i.e.*, horizontal and vertical location, will evolve according to the capabilities and advancements of PSAPS and critical vendors.

Local public safety officials will follow their own path to secure funding and upgrade technical capabilities for Phase II E911 services. When a PSAP becomes capable of receiving, processing and utilizing location data, Docomo will implement a solution for delivery. Docomo is prepared to begin providing Phase II and indoor location information required under 47 C.F.R. §§ 20.18(e)-(i) within six months of receipt of a request from a PSAP for Phase II location data, per 47 C.F.R. §§ 20.18(f) and (g)(2).

Participation by state and local authorities is essential for Docomo to perform its role in facilitating E911 location services. When E911 systems are activated, Docomo will work to incorporate technological advancements to deliver accurate and useful location information to emergency dispatch personnel.

Accordingly, Docomo will seek to achieve location accuracy progress as PSAP and industry technology permits to enhance the safety of emergency callers in its service area.

If the Commission requires additional information, Docomo will be pleased to provide it upon request.



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Docomo Pacific, Inc.

Date: July 27, 2018