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*Via ECFS*

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

Re: Custer Telephone Cooperative, Inc.  
Second Progress Report  
E911 Location Accuracy, PS Docket No. 07-114

Dear Ms. Dortch:

Pursuant to Section 20.18(i)(4)(ii) of the Commission's Rules, Custer Telephone Cooperative, Inc. ("Custer") hereby submits its second progress report on implementation of indoor location accuracy improvements.

Please contact the undersigned counsel should you have any questions.

Very truly yours,



D. Cary Mitchell  
Its Counsel

# Custer Telephone Cooperative, Inc.

## E911 Location Accuracy Progress Report

47 C.F.R. § 20.18(i)(4)(ii)

PS Docket No. 07-114

### Second Progress Report

Custer Telephone Cooperative, Inc. ("Custer" or the "Company") is a Tier III CMRS service provider that provides service in the State of Idaho. The Company is a member of and provides mobile voice and data services in conjunction with the Rural Independent Network Alliance, LLC ("RINA"), which provides LTE Core hosting and CDMA switching for its member companies. Consistent with its Initial Implementation Plan and First Progress Report filed in PS Docket No. 07-114 on July 25, 2017, Custer has timely filed all required reports and compliance filings and the Company remains on course in its implementation of E911 and meeting the indoor location benchmarks established in the Fourth R&O.

- We currently provide E911 service and deliver Automatic Location Information (ALI) data to PSAPs in Butte County, Custer County and Lemhi County in the State of Idaho.
- We are filing Live Call Data reports on a semi-annual basis.
- We have entered into an agreement with Test Bed, LLC to analyze our company's live 9-1-1 call data and to facilitate our network's compliance with the indoor accuracy requirements.
  - Based on a recent 50m Accuracy Report, our rural network is identifying the x/y (horizontal) location within 50 meters for more than 50% of all 9-1-1 calls.
- Our network is capable of making uncompensated barometric data (*i.e.*, vertical location) available to PSAPs from any handset capable of delivering barometric sensor data.
- We are committed to timely meeting the increasingly stringent horizontal location accuracy benchmarks going forward.

Please direct any questions concerning this report to our counsel, Mr. Cary Mitchell, of the law firm of Blooston Mordkofsky Dickens Duffy & Prendergast, LLP. He can be reached by telephone at (202) 828-5538, or by email at [cary@bloostonlaw.com](mailto:cary@bloostonlaw.com).

7/31/18  
Dated

Dennis L. Thornock  
Dennis L. Thornock

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