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July 31, 2018

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TWA325  
Washington, DC 20554

Re: PTI Pacifica Inc. dba IT&E  
Implementation Plan and Progress Report re E911 Location Accuracy  
PS Docket No. 07-114

Dear Ms. Dortch:

PTI Pacifica Inc. dba IT&E (“PTI Pacifica”), by its counsel, hereby submits its implementation plan and progress report on implementation of indoor location accuracy improvements pursuant to Sections 20.18(i)(4)(i) and (ii) of the Commission’s Rules.

As discussed in the submission, PTI Pacifica previously has filed a request for temporary waiver of the performance and reporting requirements of Section 20.18(i), which remains pending before the Commission.

Please contact PTI Pacifica’s undersigned counsel if you have any questions.

Sincerely,

/s/ Timothy J. Cooney  
Timothy J. Cooney

**PTI Pacifica Inc. ("PTI"), doing business as IT&E,  
Initial E911 Location Accuracy Implementation Plan and Progress Report  
PS Docket No. 07-114**

PTI Pacifica Inc. ("PTI"), doing business as IT&E, hereby provides its location accuracy implementation plan and progress report, as required by Sections 20.18(i)(4)(i)-(ii) of the FCC's rules and the Fourth Report and Order in PS Docket No. 07-114, 30 FCC Rcd 1259 ( 2015) ("Fourth Report and Order"). On April 27, 2017, PTI filed in this docket a petition for temporary waiver of the Commission's indoor accuracy and reporting provisions and reporting rules up to and until a PSAP served by PTI is capable of receiving and using Phase II E911 and indoor location data. Specifically, PTI requested a waiver of the FCC's rules requiring Commercial Mobile Radio Service ("CMRS") providers to deliver to PSAPs the 911 callers' dispatchable location or x/y location within a prescribed number of meters for a prescribed percentage of 911 calls by dates set forth in FCC Rule Section 20.18(i). PTI also requested a waiver of the associated requirements to submit to the FCC live 911 call data reports, indoor location accuracy certifications, implementation plans and progress reports required by FCC Rule Sections 20.18(i)(3)(ii)(E), 20.18(i)(3)(iii), 20.18(i)(4)(i), and 20.18(i)(4)(ii), respectively. The latter two rules are the rules that require the submission of the instant report.

PTI is a Tier III CMRS service provider in the Pacific Ocean insular territories of Guam and the Commonwealth of the Northern Mariana Islands ("CNMI") located in the Pacific Ocean approximately 6,300 miles west of Los Angeles, California. In Guam, the PSAP has limited capability to determine the location of landline calls to 911 but no capability to determine the locations of wireless calls to 911. The operation and maintenance of Guam's 911 Emergency System is through the Guam Fire Department. The Guam Fire Department is an official PSAP (hereinafter called the "Guam PSAP") and only supports Phase I E911 and only has one interface that is connected to the incumbent local exchange carrier ("ILEC") GTA TeleGuam ("GTA"). All 911 calls in Guam are routed to GTA for final delivery to the Guam PSAP.

In the CNMI, there are no street numbers; and the PSAPs on the three islands have no capability to determine the locations of either landline or wireless calls to 911. The operation and maintenance of the CNMI's 911 Emergency System is through the CNMI Department of Public Safety. The CNMI Department of Public Safety is not an official PSAP and supports neither Phase I E911 nor Phase II E911.

***Progress Report***

PTI has worked and will continue to work with local public safety to serve emergency callers. To date, PTI has submitted the following E911 documentation to the FCC:

February 3, 2017

PTI submitted its Non-Nationwide Carrier Live 911 Call Report to the FCC.

April 27, 2017

PTI submitted its petition for temporary waiver of FCC Rule Sections 20.18(i)(3)(ii)(E), 20.18(i)(3)(iii), 20.18(i)(4)(i), and 20.18(i)(4)(ii). The petition is still pending.

August 3, 2017

PTI submitted its initial plans for implementing indoor location accuracy requirements in accordance with Section 20.18(i)(4)(i) of the FCC's rules and its first progress report on implementation of indoor location accuracy requirements in accordance with Section 20.18(i)(4)(ii) of the FCC's rules.

February 1, 2018

PTI submitted its Non-Nationwide Carrier Live 911 Call Report to the FCC.

June 4, 2018

PTI renewed its request for waiver of Section 20.18(i)(2)(iii) in response to the Public Safety and Homeland Security Bureau's March 30, 2018 *Public Notice*.<sup>1</sup>

### ***Implementation Plan***

PTI will implement indoor location accuracy plans and provide Phase II and indoor location information within six months of when a PSAP requests Phase II capabilities. Even as PTI requested a waiver so that it need not collect and report data that cannot be utilized by local PSAPs, PTI has begun seeking 911 technical experts' proposals for development of plans to implement E911 location services so that when either the Guam PSAP or CNMI PSAP is capable of receiving, processing, and utilizing the data requests for such services, the plans can be implemented in a timely manner. When either the Guam PSAP or CNMI PSAP submits a request for enhanced 911 services, PTI will cooperate with the relevant PSAP to meet its Section 20.18 obligations on a timely and mutually agreeable basis.

Please contact PTI's outside counsel Timothy Cooney at 202-383-3361 or [tcooney@wbklaw.com](mailto:tcooney@wbklaw.com) if you have any questions.



Steven Carrara  
General Counsel

Date: July 31, 2018

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<sup>1</sup> *Public Safety and Homeland Security Bureau Provides Guidance to CMRS Providers Regarding Upcoming Certification Of Compliance With Three-Year E911 Location Accuracy Benchmark And Reminds CMRS Providers of Additional Location Accuracy Deadlines in 2018*, Public Notice, DA 18-323 (PSHSB Mar. 30, 2018).