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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: Brookings Municipal Utilities d/b/a Swiftel Communications  
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, Brookings Municipal Utilities d/b/a Swiftel Communications ("Swiftel") 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

# Brookings Municipal Utilities d/b/a Swiftel Communications

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

## Second Progress Report

The City of Brookings Municipal Utilities d/b/a Swiftel Communications ("Swiftel" or "the Company") is a small Tier III wireless carrier that provides mobile voice and data services in eastern South Dakota, northwest Iowa and northeast Nebraska pursuant to an affiliation arrangement with Sprint Corporation ("Sprint"). Consistent with its Initial Implementation Plan and First Progress Report filed in PS Docket No. 07-114 on August 3, 2017, Swiftel remains on course in its implementation of E911 and meeting the indoor location benchmarks established in the Fourth R&O.

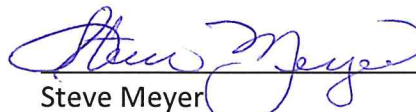
To facilitate its affiliation arrangement with Sprint, Swiftel has configured its network to operate as a seamless part of the Sprint nationwide network. Swiftel's customers utilize Sprint-configured wireless devices and the Company relies on Sprint for the provision and support of Location Based Services ("LBS"), including managed Enhanced 911 ("E911") processes. As a result of this arrangement, Swiftel is a direct beneficiary of Sprint's work on the development, testing and implementation of E911 indoor location accuracy solutions and participation in industry standards bodies. These efforts are described in Sprint's Initial Implementation Plan and Progress Report that was filed with the Commission on February 3, 2017,<sup>1</sup> and which is incorporated herein by reference.

- In conjunction with Sprint, we currently provide E911 Phase II service and deliver Automatic Location Information (ALI) data to all Phase II capable PSAPs in our service area.
- Our rural network is capable of 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).

8/2/18

Dated



Steve Meyer

General Manager and Executive Vice President

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<sup>1</sup> Sprint Wireless E911 Location Accuracy Initial Implementation Plan and Progress Report, PS Docket No. 07-114 (filed February 3, 2017) ("*Sprint Initial Implementation Plan and Progress Report*").