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August 3, 2017

Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: CT Cube, L.P.
E911 Location Accuracy Implementation Plan and Progress Report
PS Docket No. 07-114

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of CT Cube, L.P., is its E911 location accuracy implementation plan and progress report.

Should you have any questions, please contact undersigned counsel.

Sincerely,

/s/ Michael R. Bennet

Michael R. Bennet

Attachment

4832-8107-7302, v. 1

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

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Wireless E911 Location Accuracy Requirements)

PS Docket No. 07-114

CT Cube, L.P. E911 Implementation Plan and Initial Progress Report

CT Cube, L.P. ("CT Cube"), pursuant to Section 20.18(i)(4)(i)-(ii) of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its location accuracy implementation plan and initial progress report.

CT Cube is a small non-nationwide CMRS carrier and does not provide service in any of the top 50 CMAs. CT Cube entered into a services agreement with West Safety Services ("West") for infrastructure, software and services to enable CT Cube to provide enhanced 911 ("E911") location data to E911-capable public safety answering points ("PSAPs"). CT Cube has utilized the Location Performance Management ("LPM") tool provided by West to ensure compliance with location accuracy requirement of Section 20.18(i)(2)(i)(B)(1) of the FCC's rules. The LPM allows users to optimize network accuracy and identify areas for improvement. Its performance monitoring and reporting tools identify location performance issues and provide reports that allow for auditing key performance indicators and call results and analyze location server performance. The LPM provides live call data reports, 50 meter accuracy reports, and PSAP reports consistent with ATIS's 05000031 recommendation.

Although CT Cube complies with the current location accuracy benchmark, it has been working to improve its location accuracy by installing a new server, the first phase of which was completed during the last quarter of 2016. The first quarter of 2017 was spent optimizing accuracy and in the second quarter of 2017, CT Cube began the process of site certification with its local COGs and PSAPs.

CT Cube plans to continue to do further testing and site certification to determine if additional measures are necessary to meet applicable future indoor horizontal location accuracy benchmark, and then make network improvements and adjustments to existing sites as necessary. Because CT Cube does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.



Mike Higgins, Jr.

General Manager

Date: August 2, 2017