



**August 3, 2018**

**Via ECFS**

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

**Re: Choice Wireless, LLC  
E911 Location Accuracy Progress Report  
PS Docket No. 07-114**

Womble Bond Dickinson (US) LLP

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Dear Ms. Dortch:

Pursuant to 47 C.F. R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of Choice Wireless, LLC, is its E911 location accuracy progress report.

Should you have any questions, please contact undersigned counsel.

Best regards,

**Womble Bond Dickinson (US) LLP**

*/s/ Michael R. Bennet*

Michael R. Bennet  
Partner

Attachment

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

**Choice Wireless, LLC E911 Location Accuracy 36 Month Progress Report**

Choice Wireless, LLC ("Choice"), pursuant to Section 20.18(i)(4)(ii) of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its 36 month progress report.

Choice is a small non-nationwide CMRS carrier providing service to retail customers in Archer County, Texas. Choice does not provide service in any of the top 50 CMAs. Choice currently provides Phase I E911 service. Because Choice operates a single cell site, it is unable to triangulate, and is therefore unable to provide location data in accordance with Section 20.18(i) and has requested a waiver of Section 20.18(i) which remains pending.

Choice has initiated an upgrade of its network to 3G/4G. Pursuant to that upgrade, Choice will buildout an additional three cell sites, which upon completion (estimated to occur in 2019) will allow it to triangulate signals and employ its chosen network-based E911 solution. Choice is in discussions with Airspan Networks and ZTE to provide base station equipment and contracted with Polaris Wireless to provide an E911 location data solution. When it completes its network upgrade and fully implements the Polaris E911 solution, Choice is optimistic that it will meet the current 50% benchmark set forth in Section 20.18(i)(2)(i)(B)(2). However, until its network upgrade is complete and its E911 solution implemented, Choice cannot determine definitively whether additional measures will be necessary to comply with the existing benchmark as well as applicable future horizontal location accuracy benchmarks. Choice plans on taking whatever measures are necessary to meet all such benchmarks. Choice does not currently plan to implement VoLTE so the benchmarks set forth in Sections 20.18(i)(2)(i)(B)(3)-(4) are likely to be inapplicable. Choice will make available to PSAPs uncompensated barometric pressure data for any 911 call placed from any handset offered by Choice that has the capability to deliver barometric sensor data. Because Choice does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.



Date: August 2, 2018

Nati Avner, Director