



August 3, 2017

**VIA ECFS**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**RE: Puerto Rico Telephone Company, Inc. d/b/a Claro  
E911 Location Accuracy Implementation Plan and Progress Report**

Dear Ms. Dortch:

Pursuant to Section 20.18(i)(4)(i) and (ii) of the Commission's rules, 47 C.F.R. §§ 20.18(i)(4)(i)-(ii), Puerto Rico Telephone Company, Inc. d/b/a Claro, hereby reports to the Commission on its plans for meeting the indoor location accuracy requirements of Section 20.18(i)(2) and submits its progress report on the implementation of these requirements.

**I. Introduction**

The Commission's Fourth Report and Order in the matter captioned *In re Wireless 911 Location Accuracy Requirements*, PS Docket No. 07-114, requires that non-nationwide CMRS providers, such as Claro, report to the Commission on their plans for meeting the indoor location accuracy requirements of Section 20.18(i)(2) and their progress toward implementing these requirements by August 3, 2017. The instant document set forth the steps that Claro has taken since the adoption of the Fourth Report and Order to improve location accuracy and comply with the Commission's requirements and its ongoing plans to ensure compliance with remaining benchmarks. Claro is a non-nationwide CMRS provider that neither provides service or report live call data in any of the Test Cities identified in Section 20.18(i)(1)(vi) nor serves any of the top 25 or 50 CMAs.

**II. Horizontal Location**

Section 20.18(i)(2)(i)(B) establishes various benchmark dates for compliance with the requirement to provide dispatchable location or x/y location within 50 meters. Claro opted for the x/y location benchmark. On May 25, 2017, Claro certified to the Commission that as of April 3, 2017 it has been in compliance with the requirement to provide this information for 40 percent of all wireless 911 calls. As a non-nationwide CRMS providers that does not provide service or report live call data in any of the Test Cities, Claro also certified that it verified its compliance based on its own live call data. Claro uses a mix current location technologies (AGPS & RTT) and a robust wireless network in combination to a Comtech location platform since 2008 allowing to achieve this benchmark.

As to the deadline of April 3, 2018 to provide dispatchable location or x/y location within 50 meters for 50 percent of all wireless 911 calls, Claro anticipates that, by this date, all 911 calls will still originate over its 2G and 3G network. Claro already complies with this benchmark, as it currently locates 56.12% of 911 within a 50 meter accuracy as stated on the 1stQ and 2ndQ 2017 E911 Location Accuracy Live Call Data Report submitted on August 2, 2017.

The five-year benchmark of Section 20.18(i)(2) requires achieving the 70 percent threshold by August 3, 2020 or within 6 months of the provider's deployment of a commercially operating VoLTE network, whichever is later. Claro plans to launch VoLTE 911 by the end of 2018. This is anticipating that VoLTE handsets will be capable of reporting Wi-Fi and Bluetooth Low Energy (BLE) access points by that year.

Hence, by August 3, 2020, Claro anticipates meeting this milestone with a mix of our current location technologies (AGPS & RTT) as well as dispatchable location procured from the National Emergency Address Database (NEAD). Claro is working with our location platform vendor Comtech to ensure that the appropriate enhancements in the network along with the necessary interface to the NEAD will be in place on time. Furthermore, we are also working with the PSAP to ensure that they will be able to accept dispatchable location in this timeframe.

The six-year benchmark of Section 20.18(i)(2)(i)B requires achieving the 80 percent call threshold by April 3, 2021 or within 1 year of the provider's deployment of a commercially operating VoLTE network, whichever is later. Anticipating that VoLTE handsets will be capable of reporting Wi-Fi and BLE access points by 2018, Claro plans to launch VoLTE 911 by the end of 2018. Hence, by this date, we anticipate meeting this milestone with a mix of our current location technologies as well as dispatchable location procured from the NEAD.

### **III. Vertical Location**

Section 20.18(i)(2)(ii) requires CMRS providers like Claro to begin delivering uncompensated barometric pressure data to PSAP from any device capable of doing so. To comply with this, Claro is currently working with our handset vendors to determine if there will be any handsets capable of reporting Uncompensated Barometric Pressure (UBP) measurements when on a circuit switched 911 call. Claro is also working with our PSAP community to ensure whether they will be ready to accept UBP information over the E2 interface. If there will be any such handsets, Claro's plan is to enhance the RAN and Core Networks to be able to accept this information and pass this along to the PSAPs as soon as they are ready to accept it.

Should you have any questions with respect to this matter, you may contact the undersigned at your best convenience.

Respectfully submitted,

/s/ Rita M. González

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