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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: Limitless Mobile, LLC Debtor-in-Possession
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 Limitless Mobile, LLC Debtor-in-Possession, 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

**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

Limitless Mobile, LLC E911 Implementation Plan and Initial Progress Report

Limitless Mobile, LLC Debtor-in-Possession ("Limitless"), 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.

Limitless is a small non-nationwide CMRS carrier providing service in Pennsylvania. Limitless does not provide service in any of the top 50 CMAs. Limitless is in compliance with the location accuracy requirement of Section 20.18(i)(2)(i)(B)(1) of the FCC's rules. Limitless relies on a handset-based solution for the provision of enhanced 911 ("E911") location accuracy data to requesting public safety answering points ("PSAPs"). The ability to offer GPS-enabled handsets has allowed Limitless to provide the required level of accuracy. The majority of Limitless's retail subscribers utilize GPS-enabled handsets, and Limitless expects its level of accuracy to improve as this penetration rate increases and as new handsets are introduced into the market, and that it will meet all applicable benchmarks. Because Limitless does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.



Chuck Huffman

VP of Commercial Operations

Date: August 1, 2017