



**August 3, 2018**

**Via ECFS**

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

**Re: Mid-Tex Cellular Ltd.  
E911 Location Accuracy Progress Report  
PS Docket No. 07-114**

Womble Bond Dickinson (US) LLP

1200 Nineteenth Street, NW  
Suite 500  
Washington, DC 20036

t: 202.467.6900  
f: 202.467.6910

Michael R. Bennet  
Partner  
Direct Dial: 202-857--4442  
Direct Fax: 202-261-0042  
E-mail: [Michael.Bennet@wbd-us.com](mailto:Michael.Bennet@wbd-us.com)

Dear Ms. Dortch:

Pursuant to 47 C.F. R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of Mid-Tex Cellular Ltd., 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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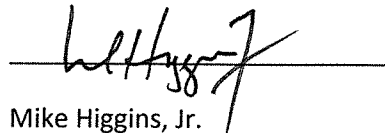
Wireless E911 Location Accuracy Requirements ) PS Docket No. 07-114

**Mid-Tex Cellular Ltd. E911 Location Accuracy 36 Month Progress Report**

Mid-Tex Cellular Ltd. ("Mid-Tex"), 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.

Mid-Tex is a small non-nationwide CMRS carrier and does not provide service in any of the top 50 CMAs. Mid-Tex entered into a services agreement with West Safety Services ("West") for infrastructure, software and services to enable Mid-Tex to provide enhanced 911 ("E911") location data to E911-capable public safety answering points ("PSAPs"). Mid-Tex 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)(2) 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 Mid-Tex complies with the current location accuracy benchmark, it has been working to improve its location accuracy and installed a new server during the fourth quarter of 2017. Mid-Tex plans to do further testing and site certification to determine if additional measures are necessary to meet applicable future indoor horizontal location accuracy benchmarks, and then make network improvements and adjustments to existing sites as necessary. Mid-Tex will make available to PSAPs uncompensated barometric pressure data for any 911 call placed from any handset offered by Mid-Tex that has the capability to deliver barometric sensor data. Because Mid-Tex 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, 2018