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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: Copper Valley Wireless, LLC
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 Copper Valley Wireless, LLC, 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

Copper Valley Wireless, LLC E911 Implementation Plan and Initial Progress Report

Copper Valley Wireless, LLC ("CVW"), 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.

CVW is a small wireless telecommunications carrier providing service in the Copper River valley area of Alaska and Prince William Sound, a remote and sparsely populated area in southcentral Alaska, which is not in any of the top 50 CMAs. This area encompasses approximately 20,649 square miles and is bounded by the Gulf of Alaska to the south, the Alaska Range to the north, the Wrangell-St. Elias National Park and Preserve to the east, and the Talkeetna and Chugach Mountains to the west. Due to the size of its service area, the low population density, and the challenging weather and terrain, CVW relies on the FCC's high cost funding programs to maintain its expansive wireless network.

CVW is served by three PSAPs – the Valdez Police and Fire Department ("Valdez"), Cordova Police-Fire Department ("Cordova"), and the Matanuska-Susitna Borough ("Matanuska").¹ CVW currently provides Basic 911 service. In other words, in accordance with Section 20.18(b) of the Commission's rules, CVW transmits all wireless calls to a PSAP or appropriate local emergency authority.

The FCC's rules impose additional obligations on wireless carriers who receive a request for Phase I or Phase II enhanced 911 ("E911") service from a designated PSAP which is capable of receiving and utilizing the requested data elements.² CVW is not subject to a valid request for Phase I or Phase II E911 service from any of its PSAPs or local emergency authority.³ Moreover, the Cordova and Matanuska PSAPs have stated to CVW that they are currently unable to receive or utilize Phase I or Phase II location data and/or indoor location data.⁴ CVW is currently working with the Valdez PSAP to

¹ Because no PSAP or designated statewide default answering point exists in the Glennallen portion of CVW's service territory, 911 calls placed in Glennallen are routed to the local trooper station which typically automatically forwards them to the police department and Matcom dispatch office in Wasilla, Alaska.

² See 47 C.F.R. §20.18(d)-(g); §20.18(m).

³ The Matanuska PSAP made a request for Phase I and Phase II service from CVW, but subsequently formally withdrew that request on July 7, 2009.

⁴ The Matanuska PSAP is unable to receive or utilize indoor location data, while the Cordova PSAP and Wasilla dispatch office are unable to receive or utilize any type of location data. See also Cordova Wireless Communications, LLC Petition for Temporary Waiver, CC Docket No. 94-102, filed February 3, 2017 (noting that the PSAP for the City of Cordova is not capable of receiving and utilizing Phase II E911 location data or indoor location accuracy data).

provide Phase I E911 service, but the Valdez PSAP is currently unable to receive or utilize Phase I, Phase II, or indoor location data, and has not requested that CVW provide Phase I service.

In 2015, the Commission adopted amendments to its E911 rules which established new indoor location accuracy requirements.⁵ Although the requirements as originally adopted conditioned a wireless carrier's obligation to meet certain indoor location accuracy benchmarks on the receipt of a valid PSAP request for indoor location accuracy data, the Commission subsequently issued, without explanation, an Erratum that removed this condition.⁶

Because CVW is not subject to a valid request for E911 location data from any of its PSAPs or local emergency authority, on March 29, 2017, CVW filed a petition for waiver of the indoor location accuracy and associated reporting requirements of Section 20.18(i) of the FCC's rules. That petition remains pending.

In its waiver petition, CVW requested a temporary waiver of Section 20.18(i) with respect to each PSAP until such PSAP is able to receive and utilize indoor location accuracy data and makes a bona fide request for such data. Based on discussions with its local PSAPs, CVW does not expect any of them to be prepared to receive and utilize E911 indoor location data until 2020 at the earliest. CVW has plans to upgrade its network to 4G LTE by the end of 2018, which in conjunction with implementation of an E911 solution selected in conjunction with its switch host, Verizon Wireless, will allow CVW to provide indoor location information in compliance with Section 20.18(i) within six months of receipt of a bona fide PSAP request. To the extent that testing reveals a need for additional improvement in location accuracy in order to meet applicable future benchmarks, CVW plans on taking whatever additional steps are necessary to achieve the required degree of accuracy. Because CVW does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.



Christopher Spencer

Chief Executive Officer

Copper Valley Wireless

Date: August 3, 2017

⁵ *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Fourth Report and Order, rel. Feb. 3, 2015 ("Fourth Report and Order"); 47 C.F.R. §20.18(i).

⁶ *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Erratum, rel. March 3, 2015 (Erratum), at par. 6.