



August 3, 2018

VIA ECFS

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

**Puerto Rico Telephone Company, Inc. d/b/a Claro
E911 Location Accuracy Second Progress Report**

Dear Ms. Dortch:

Pursuant to Section 20.18(i)(4)(ii) of the Commission's Rules, Puerto Rico Telephone Company, Inc. d/b/a Claro ("Claro"), hereby reports its progress on the implementation for meeting the indoor location accuracy requirements of Section 20.18(i)(2).

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 progress toward implementing the indoor location accuracy requirements of Section 20.18(i)(2) by August 3, 2018. 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.

1. Two-year benchmark - Section 20.18(i)(2)(i)(B)(1)

The benchmark of Section 20.18(i)(2)(i)(B)(1) requires achieving the 40 percent threshold by April 3, 2017.

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.

2. Three-year benchmark - Section 20.18(i)(2)(i)(B)(2)

The benchmark of Section 20.18(i)(2)(i)(B)(2) requires achieving the 50 percent threshold by April 3, 2018.

On May 8, 2018, Claro certified to the Commission that as of April 3, 2018 it has been in compliance with the requirement to provide x/y location for 50 percent of all wireless 911 calls. Claro complied by having a 56.12% of all wireless 911 calls within a 50 meters accuracy. Claro uses a mix of location technologies (AGPS & RTT) and a robust wireless network in combination to a Comtech location platform since 2008 allowing to achieve this benchmark. 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.

As of today, Claro provides x/y location within 50 meters for 64.4 percent of all wireless 911 calls, and is committed to comply with all the subsequent horizontal location benchmarks of Section 20.18(i)(2)(i)(B).

3. Five-year benchmark - Section 20.18(i)(2)(i)(B)(3)

The benchmark of Section 20.18(i)(2)(i)(B)(3) 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 had plans to launch VoLTE by the end of 2018. Nevertheless, due to the aftermath of the 2017 hurricanes Irma and Maria, most of the efforts were dedicated to restoring its 2G and 3G wireless networks, and therefore, the VoLTE deployment has been postponed to 2020.

Taking into consideration the revised timeline, Claro plans to comply with the five-year benchmark of Section 20.18(i)(2)(i)(B)(3) by August 3, 2020. Claro will achieve this milestone with a mix of its current location technologies (AGPS & RTT) as well as dispatchable location procured from the National Emergency Address Database (NEAD), once it has been implemented pursuant to Section 20.18(i)(4)(iii) and (iv).

4. Six-year benchmark - Section 20.18(i)(2)(i)(B)(4)

The benchmark of Section 20.18(i)(2)(i)(B)(4) 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.

Once Claro has deployed its VoLTE network and considering the fact that VoLTE handsets are already capable of reporting Wi-Fi and Bluetooth Low Energy (BLE) access points, Claro do not foresee any obstacles to comply with this benchmark with a mix of its

current location technologies (AGPS & RTT), as well as dispatchable location procured from the NEAD.

III. Vertical Location

Pursuant to Section 20.18(i)(2)(ii)(A), by August 3, 2018 all CMRS providers must begin to make uncompensated barometric pressure ("UBP") data available to PSAPs with respect to any 911 call placed from any handset that has the capability to deliver barometric sensor information.

As of today, and to Claro's best knowledge, none of the handsets currently offered has the capability to deliver barometric sensor information over its 2G and/or 3G networks to the PSAP. As part of Claro's network evolution, there is necessary replacement of the current E911 platform to turn it into a virtual environment, which may support UBPP information, allowing to capture and share it over VoLTE. Considering that Claro's VoLTE deployment has been postponed to the end of 2020, we are planning to have the integration completed by the 2nd quarter of 2021, since the estimated integration process is expected to take between 6 to 8 weeks after the VoLTE implementation.

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

Rita M. González, Sub-Director
Planning and Engineering Wireless Network
Puerto Rico Telephone Company, Inc. dba Claro
PO Box 360998
San Juan, PR 00936-0998
787-792-3256
rgonzalez2@claropr.com