

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Wireless E911 Location Accuracy Requirements)	PS Docket 07-114
)	

**NON-NATIONWIDE CARRIER E911 LOCATION ACCURACY
INITIAL IMPLEMENTATION PLAN AND PROGRESS REPORT**

Thumb Cellular, LLC (“Reporter”), a non-nationwide carrier, by its attorney, and pursuant to 47 C.F.R. § 20.18(i)(4)(i) and § 20.18(i)(4)(ii), hereby submits its initial E911 location accuracy implementation plan and its first report regarding progress toward implementation of the indoor location accuracy requirements specified at 47 C.F.R. § 20.18(i)(2).¹ In support whereof, the following is respectfully submitted:

As a non-nationwide carrier Reporter lacks the size, market power, and ability to control the manufacture and distribution of E911 location accuracy equipment, software, and associated services. Reporter must rely upon other industry actors over which it exercises no control to obtain the necessary equipment, software and services to implement the Commission’s location accuracy requirements specified at 47 C.F.R. § 20.18(i)(2). That said, Reporter has acquired and fully intends to acquire the necessary equipment, software, and associated services as they are made available to

¹ The second progress is due one year after submission of the instant report.

meet the following E911 location accuracy service benchmarks applicable to non-nationwide carriers specified at § 20.18(i)(2)(B).

Horizontal Location Implementation and Progress: Reporter utilizes E911 live call data to test and measure its location accuracy rollout with the goal of “provid[ing] dispatchable location or x/y location within 50 meters, for the following percentages of wireless 911 calls” as follows:

(1) April 3, 2017 (two year benchmark): 40 percent of all wireless 911 calls. Reporter has satisfied this requirement (certification submitted May 29, 2017).

(2) April 3, 2018 (three year benchmark): 50 percent of all wireless 911 calls. Reporter has satisfied this requirement (certification due within 60 days of compliance deadline).

(3) August 3, 2018: commence delivery of uncompensated barometric pressure data to PSAPs from any device capable of doing so (on this date also submit Reporter’s second progress report on implementation of indoor location accuracy requirements).

(4) April 3, 2020 (five year benchmark): 70 percent of all wireless 911 calls. Reporter has satisfied this requirement (certification due within 60 days of compliance deadline).

(5) April 3, 2020 (five year benchmark) or within 6 months of Reporter’s deployment of a commercially operating VoLTE network, whichever is later: 70 percent of all wireless 911 calls originated on the VoLTE network (certification due within 60 days of compliance deadline).

(6) April 3, 2021 (six year benchmark): 80 percent of all wireless 911 calls (certification due within 60 days of compliance deadline) (vertical location is not applicable to Reporter because it is not a nationwide carrier serving a Top 25 CMA market).

(7) April 3, 2021 (six year benchmark) or within 1 year of Reporter’s deployment of a commercially operating VoLTE network, whichever is later: 80 percent of all wireless 911 calls originated on the VoLTE network (certification due within 60 days of compliance deadline) (vertical

location is not applicable to Reporter because it is not a nationwide carrier serving a Top 25 CMA market).

Vertical Location Implementation:

(8) April 3, 2022 (seven year benchmark): Vertical/dispatchable location is not applicable to Reporter because Reporter does not serve a Top 25 CMA market covered by this benchmark.

(9) April 3, 2023 (eight year benchmark): Vertical/dispatchable location is not applicable to Reporter because Reporter is not a nationwide carrier serving a Top 50 CMA market covered by this benchmark.

(10) April 23, 2024 (nine year benchmark): Vertical/dispatchable location is not applicable to Reporter because Reporter does not serve a Top 50 CMA market covered by this benchmark.

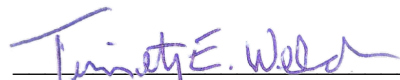
Reporter is not participating in the development of the NEAD database.

Please contact the undersigned if there are any questions about this Implementation Plan or Report.

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Respectfully submitted,
THUMB CELLULAR, LLC



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