



**Law Offices of Bennet & Bennet, PLLC**

***Maryland***

6124 MacArthur Boulevard  
Bethesda, Maryland 20816  
Tel: (202) 371-1500  
Fax: (202) 371-1558  
[www.bennetlaw.com](http://www.bennetlaw.com)

***District of Columbia***

5185 MacArthur Boulevard, NW, Suite 729  
Washington, DC 20016

**Caressa D. Bennet**

**Michael R. Bennet**

**Marjorie G. Spivak\***

**Howard S. Shapiro**

\* Admitted in DC & PA Only

**Daryl A. Zakov<sup>^</sup>**

**Robert A. Silverman**

**Erin P. Fitzgerald**

**Frederick W. Giroux<sup>#</sup>**

<sup>^</sup>Admitted in DC & WA Only

<sup>#</sup>Admitted in DC & MA Only

August 3, 2017

**Via ECFS**

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

RE: CGKC&H No. 2 Rural Cellular Limited Partnership  
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 CGKC&H No. 2 Rural Cellular Limited Partnership, 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

)

)

Wireless E911 Location Accuracy Requirements )

PS Docket No. 07-114

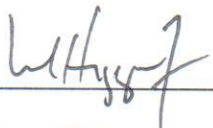
**CGKC&H No. 2 Rural Cellular Limited Partnership E911 Implementation Plan and Initial Progress Report**

CGKC&H No. 2 Rural Cellular Limited Partnership ("CGKC&H"), 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.

CGKC&H is a small non-nationwide CMRS carrier and does not provide service in any of the top 50 CMAs. CGKC&H entered into a services agreement with West Safety Services ("West") for infrastructure, software and services to enable CGKC&H to provide enhanced 911 ("E911") location data to E911-capable public safety answering points ("PSAPs"). CGKC&H 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)(1) 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 CGKC&H complies with the current location accuracy benchmark, it has been working to improve its location accuracy by installing a new server, the first phase of which was completed during the last quarter of 2016. The first quarter of 2017 was spent optimizing accuracy and in the second quarter of 2017, CGKC&H began the process of site certification with its local COGs and PSAPs.

CGKC&H plans to continue to do further testing and site certification to determine if additional measures are necessary to meet applicable future indoor horizontal location accuracy benchmark, and then make network improvements and adjustments to existing sites as necessary. Because CGKC&H 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, 2017