

**FTC Communications, LLC**  
**E911 Indoor Location Accuracy: 36-Month Progress Report**  
**PS Docket 07-114**  
**August 3, 2018**

**I. Introduction**

In this 36-Month Progress Report (“Report”), FTC Communications, LLC (“Company”) provides an update on its efforts to implement the Federal Communications Commission’s (“FCC” or “Commission”) requirements for E911 indoor location accuracy (“Accuracy Requirements”), identifying progress made since the Company’s August 3, 2017 filing of its implementation plan and initial report (“Plan”) on the Accuracy Requirements. Company also provides an assessment of its deployment of dispatchable location solutions in this Report.

Company is a non-nationwide CMRS provider. Company has been implementing and reporting on, and will continue to implement and report on the Accuracy Requirements consistent with the *Parallel Path for Competitive Carriers’ Improvement of E911 Location Accuracy Standards* as submitted by the Competitive Carriers Association to the FCC. As stated in Company’s Plan, Company’s implementation of the Accuracy Requirements continues to evolve consistent with improvements and limitations realized by the nationwide CMRS providers, relevant communications vendors, and industry organizations leading the efforts to increase E911 indoor location accuracy.

Company submitted live 911 call data reports in February and August 2017, and February 2018, as well as certifications of compliance in June 2017 and June 2018 with regard to the April 2017 and April 2018 horizontal location requirements respectively. Company has also recently submitted the next semi-annual live 911 call data report for August 2018.

**II. Horizontal Location Accuracy**

Company continues to use location technologies that are consistent with deployment and testing in the 911 location accuracy test bed. Company continues to assess the accuracy of those technologies in accordance with relevant ATIS industry standards. Company continues to monitor the efforts of the nationwide CMRS providers, 911 service providers, and other industry leaders with regard to the development and improvement of location technologies.

Company has improved, and continues to improve, its ability to deliver dispatchable locations or x/y geographic coordinates within 50-meter accuracy through improved handsets and network tools, while continuing to assess new and improved location technologies and other products and services appropriate for the morphologies that Company serves. Company anticipates deploying improved technologies, products, and services when and where it is appropriate and feasible to do so.

Company expects that it will continue to be able to meet the increasing Accuracy Requirements inherently based on the continued improvement of the location accuracy implementation efforts of the nationwide CMRS providers. Company expects to continue following the implementation efforts of the nationwide CMRS providers where relevant and appropriate for Company’s network and morphology(ies) served.

**FTC Communications, LLC**  
**E911 Indoor Location Accuracy: 36-Month Progress Report**  
**PS Docket 07-114**  
**August 3, 2018**

**III. Vertical Location Accuracy**

Company continues to monitor the efforts of the nationwide CMRS providers, 911 service providers, and other industry leaders with regard to developments for delivering a 911 caller's vertical location where appropriate, specifically based on implementation and availability of the National Emergency Access Database ("NEAD"), as well as development and testing of Z-axis solutions. Company expects to adopt solutions that will meet vertical location requirements where appropriate based on the direction taken by nationwide CMRS providers. As of August 3, 2018, Company will make uncompensated barometric data available to Public Safety Answering Points for any 911 calls placed from subscriber handsets having the capability to deliver barometric sensor information.