

Wireless Partners, LLC
E911 Location Accuracy Implementation -- Second Progress Report
PS Docket No. 07-114
August 3, 2018

Wireless Partners, LLC (“Wireless Partners”) hereby provides its second E911 location accuracy implementation progress report, as required by Sections 20.18(i)(4)(i)-(ii) of the FCC’s rules and the Fourth Report and Order in PS Docket No. 07-114, 30 FCC Rcd 1259 (2015) (“Fourth Report and Order”).

Progress Report

Wireless Partners has worked to provide public safety with accurate location data for emergency callers. To date, Wireless Partners has timely performed its 2017 Fourth Report and Order location accuracy obligations and has submitted compliance documentation to the FCC by the following deadlines:

February 3, 2017

Wireless Partners’s Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC to provide aggregate live 911 call data covering the reporting period October through December 2016. As a non-nationwide CMRS provider that does not provide coverage in any of the six Test Cities, Wireless Partners provided data in accordance with Section 20.18(i)(3)(ii) of the FCC’s rules. Wireless Partners’s report also was sent to the National Emergency Number Association (NENA), the Association of Public-Safety Communications Officials (APCO) and the National Association of State 911 Administrators (NASNA).

April 3, 2017

In accordance with Section 20.18(i)(2)(i)(B)(1) of the FCC’s rules, Wireless Partners had begun to provide dispatchable location or x/y location information within 50 meters for 40 percent of all wireless 911 calls.

May 22, 2017

Wireless Partners submitted to the FCC certification that as of April 3, 2017, it did not provide coverage in any of the six Test Cities, was providing dispatchable location or x/y location information within 50 meters for 40 percent of all wireless 911 calls, had deployed the indoor location technology or technologies used in its networks consistently with the manner in which such technologies have been tested in the test bed, and had verified based on its own live call data that it was in compliance with the two-year benchmark set forth in Section 20.18(i)(2)(i)(B)(1) of the FCC’s rules.

August 1, 2017

Wireless Partners's second Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC providing aggregate live 911 call data covering reporting period January through June 2017, with copies sent to NENA, APCO and NASNA.

August 3, 2017

As a non-nationwide provider, Wireless Partners submitted its initial plans for implementing indoor location accuracy requirements in accordance with Section 20.18(i)(4)(i) of the FCC's rules and submitted its first progress report on implementation of indoor location accuracy requirements in accordance with Section 20.18(i)(4)(ii) of the FCC's rules.

February 1, 2018

Wireless Partners's third Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC covering the reporting period June through December 2017, with copies sent to NENA, APCO and NASNA.

April 3, 2018

In accordance with Section 20.18(i)(2)(i)(B)(2) of the FCC's rules, Wireless Partners had begun to provide dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls.

June 5, 2018

Wireless Partners submitted to the FCC certification that as of April 3, 2018, it did not provide coverage in any of the six Test Cities, was providing dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls, had deployed the indoor location technology or technologies used in its networks consistently with the manner in which such technologies have been tested in the test bed, and had verified based on its own live call data that it was in compliance with the three-year benchmark set forth in Section 20.18(i)(2)(i)(B)(2) of the FCC's rules.

August 3, 2018

Wireless Partners's fourth Non-Nationwide Carrier Live 911 Call Report was submitted to the FCC covering the reporting period January through June 2018, with copies sent to NENA, APCO and NASNA.

August 3, 2018

Wireless Partners hereby submits this second progress report regarding its efforts to implement indoor location accuracy requirements in accordance with Section 20.18(i)(4)(ii) of the FCC's rules. As indicated in its June 5, 2018 certification, Wireless Partners, as of April 3, 2018, was providing dispatchable location or x/y location information within 50 meters for 50 percent of all wireless 911 calls, had deployed the indoor location technology or technologies used in its networks consistently with the manner in which such technologies have been tested in the test bed, and had verified based on its own live call data that it was in compliance with the two-year benchmark set forth in Section 20.18(i)(2)(i)(B)(2) of the FCC's rules.

Wireless Partners has adopted procedures that comply with FCC indoor accuracy requirements:

- Wireless Partners retains for two years all testing and live call data gathered for Non-Nationwide Carrier Live 911 Call Reports in accordance with Section 20.18(i)(3)(iii) of the FCC's rules.
- Wireless Partners delivers x- and y-axis (latitude, longitude) confidence and uncertainty (C/U) data for all wireless 911 calls - whether placed from indoors or outdoors - at the request of a Public Safety Answering Point (PSAP), on a per-call basis, with a uniform confidence level of 90 percent in accordance with Section 20.18(j) of the FCC's rules.
- Wireless Partners collects and retains for two years information on all wireless 911 calls placed on its network, including the positioning source method used to provide a location fix associated with the call. The data is made available to PSAPs upon request in accordance with Section 20.18(k) of the FCC's rules.

Implementation Plan

Wireless Partners operates on spectrum leased to it from Verizon Wireless under its "LTE in Rural America" program. Pursuant to its agreements with Verizon Wireless, Verizon Wireless provides network and administrative services to Wireless Partners. Wireless Partners therefore is supported for location accuracy by the various solutions described by Verizon Wireless in its February 3, 2017 filing in PS Docket No. 07-114 titled "Verizon – Indoor 911 Location Accuracy Implementation Plan and Progress Report," a copy of which was attached to Wireless Partners's August 3, 2017 first progress report on implementation of indoor location accuracy requirements. Wireless Partners thus plans to continue to meet the FCC's indoor location accuracy requirements, and will work with Verizon Wireless to incorporate technological advancements to deliver accurate and useful location information to emergency response personnel.

Wireless Partners has filed, and intends to continue to file in the future, all certifications and reports required under the FCC's rules. In addition to continuing to submit E911 live call data annually on February 1 and August 1, Wireless Partners plans to continue to meet FCC indoor location accuracy requirements of Section 20.18 of the FCC's rules, and expects to comply with the following requirements summarized on the FCC's website at

2020

- April 3, 2020 (Five-year benchmark)*: Non-nationwide providers must achieve 50-meter horizontal location accuracy or provide dispatchable location for 70 percent of all wireless 911 calls by this date or within 6 months of the provider's deployment of a commercially operating VoLTE network, whichever is later. (47 C.F.R. § 20.18(i)(2)(i)(B))

2021

- April 3, 2021 (Six-year benchmark)*: Non-nationwide providers must achieve 50-meter horizontal accuracy or provide dispatchable location for 80 percent of all wireless 911 calls by this date or within 1 year of the provider's deployment of a commercially operating VoLTE network, whichever is later. (47 C.F.R. § 20.18(i)(2)(i)(B))

2022

- April 3, 2022* (if Wireless Partners serves any of the top 25 CMAs): Non-nationwide providers that serve any of the top 25 CMAs must provide either (1) dispatchable location, or (2) vertical (z-axis) location information, in compliance with the FCC-approved metric, in those CMAs. If dispatchable location is used, there must be a density of reference points distributed throughout the CMA equivalent to 25 percent of the population in that CMA. If vertical location technology is used, it must be deployed to cover 80 percent of the CMA population. (47 C.F.R. § 20.18(i)(2)(ii)(E))

2024

- April 3, 2024 (if Wireless Partners serves any of the top 50 CMAs): Non-nationwide providers that serve any of the top 50 CMAs must deliver either (1) dispatchable location, or (2) vertical (z-axis) location information, in compliance with the FCC-approved metric, in those CMAs. If dispatchable location is used, there must be a density of reference points equivalent to 25 percent of the population in that market area. If vertical location technology is used, it must be deployed to cover 80 percent of the CMA population. (47 C.F.R. § 20.18(i)(2)(ii)(E))

* Providers must certify compliance with the benchmark within 60 days of the applicable deadline. (47 C.F.R. § 20.18(i)(2)(iii))

Please contact Wireless Partners's outside counsel Jonathan V. Cohen at 202-383-3416 or joncohen@wbklaw.com, if you have any questions.

A handwritten signature in dark ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

Thomas Buckley
Chief Technology Officer and Sr. Vice President
Wireless Partners, LLC