



Law Offices of Bennet & Bennet, PLLC

Maryland

6124 MacArthur Boulevard
Bethesda, Maryland 20816
Tel: (202) 371-1500
Fax: (202) 371-1558
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[^]

Robert A. Silverman

Erin P. Fitzgerald

Frederick W. Giroux[#]

[^]Admitted in DC & WA Only

[#]Admitted in DC & MA Only

August 11, 2017

Via ECFS

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

**Re: Palmer Wireless
E911 Location Accuracy Certification
PS Docket No. 17-78**

Dear Ms. Dortch:

Transmitted herewith, on behalf of Palmer Wireless (“Palmer”) and pursuant to Section 20.18(i)(2)(iii)(C) of the Rules and Regulations of the Federal Communications Commission, is an amended version of Palmer’s E911 Indoor Location Accuracy Certification originally submitted on June 2, 2017. Palmer mistakenly attached a copy of its 911 live call data report to that filing rather than the required certification. To the extent necessary, Palmer requests leave to file this amended certification after the June 2 deadline and, also to the extent necessary, a waiver of the filing deadline.¹

Should the Commission have any questions, please communicate directly with the undersigned.

Sincerely,

/s/ Michael R. Bennet

Michael R. Bennet

Attachment

¹ Palmer attempted to file a certification with its June 2 filing, but was unable to. Immediately after making that filing, Palmer contacted FCC staff to ask for assistance and was told that staff would be in further contact. After realizing that there had been no further communications from FCC staff, Palmer directed its attorney to file its certification.

Certification of Compliance with E911 Location Accuracy Benchmark – PS Docket No. 17-78

I, Albert Kangas am an Officer of Palmer Wireless ("Company") and I am familiar with and have responsibility for Company's indoor location accuracy compliance. I hereby certify that, as of April 3, 2017, the Company (1) does not provide service or report live call data in one or more of the Test Cities; (2) is providing dispatchable location or x/y location information within 50 meters for 40 percent of all wireless 911 calls; (3) has 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 (4) has verified based on its own live call data that it is in compliance with the two-year benchmark set forth at 47 C.F.R. §20.18(i)(2)(i)(B)(1).

A handwritten signature in blue ink, appearing to read "Albert Kangas", written over a horizontal line.

Albert Kangas

Owner and CTO

A handwritten date "8-10-2017" in blue ink, written over a horizontal line.

Date