

JONES DAY

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September 1, 2017

BY ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

**Re: Second Progress Report of Progeny LMS, LLC
WT Docket No. 12-202**

Dear Ms. Dortch:

Progeny LMS, LLC (“Progeny”), by its counsel, hereby provides its Second Progress Report regarding the status of its construction and operation of its Multilateration Location and Monitoring Service (“M-LMS”) licenses.

On January 17, 2017, the Mobility Division of the Commission’s Wireless Telecommunications Bureau issued an order granting Progeny an extension of its M-LMS buildout milestones and a renewal of its M-LMS licenses (“*Waiver Order*”).¹ Pursuant to paragraph 35 of the *Waiver Order*, Progeny is required to provide periodic reports addressing its progress toward deployment, testing, and activation in each market. In addition, for those M-LMS licenses that are past the relevant end-of-term deadline, Progeny is required to provide confirmation that such licenses continue to remain in operation providing location accuracy services.

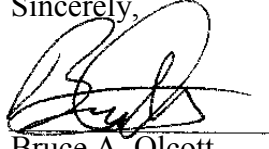
Since the filing of its initial progress report on March 1, 2017, Progeny has continued to work diligently with major wireless carriers, chipset vendors, handset manufacturers, and the public safety community on the full commercialization of Progeny’s M-LMS licenses through the development of a highly accurate indoor location service to support E911 emergency first responders. Progeny has not, however, completed the deployment, testing, or activation of its

¹ See Request of Progeny LMS, LLC for Waiver and Limited Extension of Time, WT Docket No. 12-202, *Order*, DA 17-20 (WTB, Mobility Div., Jan. 17, 2017) (“*Order*”).

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M-LMS network in any additional of its licensed Economic Areas ("EAs"). Progeny herein confirms that it continues to operate each of its M-LMS networks for its 80 M-LMS licenses covering its top 40 EAs providing location accuracy services.

Please contact the undersigned if you have any questions about this matter.

Sincerely,

Bruce A. Olcott