

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
Revision of the Commission’s Rules ) CC Docket No. 94-102  
To Ensure Compatibility with Enhanced )  
911 Emergency Calling Systems )  
To: The Commission

**Report of Limitless Mobile, LLC Regarding Wireless E911 Phase II Automatic Location Information**

Limitless Mobile, LLC (“Limitless”), formerly Keystone Wireless, LLC d/b/a Immix Wireless, pursuant to Section 20.18(l) of the Federal Communications Commission’s Rules, hereby submits a report providing an update on wireless enhanced 911 (“E911”) Automatic Location Identification (“ALI”).

**I. Contact Information**

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**II. E911 Phase II Location Technology Information**

Limitless has changed Phase II location technologies and now deploys a UMTS hybrid solution provided by West Safety Services (“WSS”) throughout its service area. The WSS Hosted Location platform (SMLC) supports the following location types for UMTS networks – basic cell ID, enhanced cell ID, A-GNSS (GPS), RTT (round trip delay), and A-GNSS plus RTT. The network RF conditions and what the device is capable of supporting will determine which location technology will be used for a particular emergency call.

**III. Testing and Verification**

Deployment drive testing was completed August 11. Every sector for every site on air was tested, making sure the correct phase 2 information was received at the PSAP.

At a future date, Limitless will be using a software package that is hosted by WSS called Location Performance Management (LPM) to drive test with baseline test points to validate the location accuracy of the Limitless network. The LPM software will report accuracy of the network fixes across each PSAP boundary using drive test log files that cross-reference the baseline GPS locations in the test area to validate location accuracy of the test emergency call.

#### **IV. Implementation Details and Schedule**

Limitless has implemented and tested new core and radio networks that utilize the 911 positioning system provided by West to transfer Phase II information to the PSAP.

#### **V. PSAP Interface**

No changes are necessary to transmit Phase II data to PSAPs. WSS provides routing instructions utilized by the WSS FMCC (or GMLC) and then through the WSS Direct Route Peering Network to route the calls to the PSAPs using existing hardware and software provided in the WSS geo-redundant data centers.

#### **VI. Handset Information**

For handsets that are incompatible with Limitless's ALI system, RTT, which uses triangulation to determine the caller's location, will be employed.

#### **VII. Other Information**

Limitless's predecessor, Keystone Wireless, LLC, received requests for Phase II service from PSAPs in the following Pennsylvania counties: Berks, Schuylkill, Montour, Northumberland, Union, Snyder, Lycoming, Clinton, and Centre. Since assuming control, Limitless continues to provide Phase II service to these PSAPs.

Respectfully submitted,

LIMITLESS MOBILE, LLC

By: /s/ Michael R. Bennet

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