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September 25, 2018

Michael Wilhelm, Division Chief  
Policy and Licensing Division  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: PS Docket No. 17-78  
E911 Location Accuracy Compliance Certification  
Pine Cellular Phones, Inc.

Dear Mr. Wilhelm:

Pursuant to 47 C.F.R. § 20.18(i)(2)(iii)(C) and FCC Public Notice, DA 18-323, released March 30, 2018, transmitted herewith on behalf of Pine Cellular Phones, Inc. is a certificate of compliance with the location accuracy standards of 47 C.F.R. § 20.18(i)(2)(ii)(A), requiring that Commercial Mobile Radio Service (CMRS) providers make available to Public Safety Answering Points (PSAPs) uncompensated barometric data with respect to any 911 call placed from any handset that has the capability to deliver barometric sensor information. Pine Cellular Phones, Inc. is a non-nationwide CMRS provider that does not provide service or report quarterly live call data in any of the six Test Cities.

Should the Commission require additional information, it is welcome to contact the undersigned.

Very truly yours,

A handwritten signature in black ink, reading "Pamela L. Gist". The signature is written in a cursive, flowing style.

Pamela L. Gist

**E911 Location Accuracy Compliance Certification**  
**47 C.F.R. § 20.18(i)(2)(iii)**  
**PS Docket No. 17-78**

Pine Cellular Phones, Inc.  
P.O. Box 548  
Broken Bow, Oklahoma 74728

**CERTIFICATION**

I, Esta O. Callaham, hereby certify that I am an officer of Pine Cellular Phones, Inc. (Pine Cellular), and that I am familiar with and have responsibility for the company's indoor location accuracy compliance, as set forth in 47 C.F.R. §§ 20.18(i) of the rules of the Federal Communications Commission.

As of August 3, 2018,

- (1) Pine Cellular does not provide service or report live call data in one or more of the Test Cities,
- (2) Pine Cellular delivers uncompensated barometric pressure data to PSAPs from any device capable of doing so,
- (3) Pine Cellular 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) Pine Cellular has verified based on its own live call data that it is in compliance with the three-year benchmark set forth at 47 CFR § 20.18(i)(2)(ii)(A).

Pine Cellular represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. Pine Cellular acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
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Esta O. Callaham  
President

Date: 9-24-18