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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 12th Street, S.W.
Washington, D.C. 20554

Re: PS Docket No. 17-78
E911 Location Accuracy Compliance Certification
Cellular Network Partnership, an Oklahoma Limited Partnership
d/b/a Pioneer Cellular

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 Pioneer Cellular, 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. Pioneer Cellular 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,



Pamela L. Gist

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

Cellular Network Partnership, An Oklahoma Limited Partnership
d/b/a Pioneer Cellular
P.O. Box 539
Kingfisher, Oklahoma 73750

CERTIFICATION

I, Dennis Mueggenborg, President of a General Partner of Cellular Network Partnership, an Oklahoma Limited Partnership d/b/a Pioneer Cellular, hereby certify 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) Pioneer Cellular does not provide service or report live call data in one or more of the Test Cities,
- (2) Pioneer Cellular delivers uncompensated barometric pressure data to PSAPs from any device capable of doing so,
- (3) Pioneer 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) Pioneer 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).

Pioneer 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. Pioneer 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.


Dennis Mueggenborg, President of O. T. & T.

Communications, Inc.,
a General Partner of Cellular Network Partnership,
an Oklahoma Limited Partnership d/b/a Pioneer Cellular

Date: September 21, 2018