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September 26, 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
Carolina West Wireless, 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 Carolina West Wireless, Inc. is a certificate of compliance with the location accuracy requirements 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. Carolina West Wireless, 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 blue ink that reads "Pamela L. Gist". The signature is written in a cursive, flowing style.

Pamela L. Gist

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

Carolina West Wireless, Inc.
P.O. Box 959
Wilkesboro, NC 28697

CERTIFICATION

I, Thad Southers, hereby certify that I am an officer of Carolina West Wireless, Inc. (CWW), 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) CWW does not provide service or report live call data in one or more of the Test Cities,
- (2) CWW delivers uncompensated barometric pressure data to PSAPs from any device capable of doing so,
- (3) CWW 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) CWW 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).

CWW 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. The company 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.



Thad Southers
Chief Financial Officer

Date: 9-26-18