

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

Bluegrass Cellular, Inc.
P.O. Box 5012
Elizabethtown, Kentucky 42702-5012

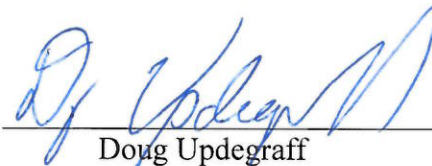
CERTIFICATION

I, Doug Updegraff, hereby certify that I am an officer of Bluegrass Cellular, Inc. (BCI), 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) BCI does not provide service or report live call data in one or more of the Test Cities,
- (2) BCI delivers uncompensated barometric pressure data to PSAPs from any device capable of doing so,
- (3) BCI 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) BCI 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).

BCI 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. BCI 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.



Doug Updegraff
Vice President & Chief Technology Officer

Date: 9-26-18