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March 30, 2015

David G. Simpson, Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, S.W.
Room 7-C485
Washington, D.C. 20554

Re: PS Docket No. 07-114
E911 Location Accuracy Exclusion Report Update
Union Telephone Company

Dear Mr. Turetsky:

On behalf of Union Telephone Company, and pursuant to FCC Rule Section 20.18(h)(1)(vi) for carriers using network-based technologies, submitted herewith is an update to the company's E911 Location Accuracy Exclusion Report. This updated Report adds Routt County, Colorado and Fallon County, Montana where it has been determined that triangulation of the geographical position of a 911 emergency call is not technically possible because of insufficient quantity, density and/or geometry of cell sites to support network-based triangulation that meets the accuracy standards.

Should any questions arise with respect to this matter, please communicate directly with this office.

Very truly yours,



Pamela L. Gist

cc: National Emergency Number Association (by email)
Association of Public-Safety Communications Officials-International (by email)
National Association of State 9-1-1 Administrators (by email)

Affidavit in Support of Updated E911 Location Accuracy Exclusion Report

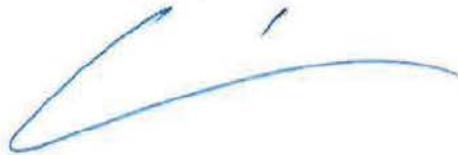
PS Docket No. 07-114

Carrier: Union Telephone Company
Technology: Network-Based
Signing officer: Eric Woody, Chief Technology and Operations Officer
Address: P. O. Box 160
Mountain View, Wyoming 82939
Telephone: (307) 782-6131

I, Eric Woody, am an officer of Union Telephone Company. I have chief oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) of the rules of the Federal Communications Commission.

Union Telephone Company uses network-based technologies to provide E911 location services. Attached hereto is an updated list of counties where Union Telephone Company is utilizing the FCC Rule Section 20.18(h)(1)(vi) exclusion from the Phase II location accuracy standards for network-based technologies. The attached list reports new and previously reported counties where cell site distribution is such that triangulation is not technically possible.

In accordance with 47 C.F.R. § 1.16(2), I declare under penalty of perjury that the foregoing is true and correct. Executed on March 30, 2015.



Eric Woody, Chief Technology and Operations Officer

Union Telephone Company

Reason for Exclusion: Insufficient number of cell sites in the area
to support network-based triangulation

Excluded Areas:

Previously reported

Newly reported

Big Horn County, Wyoming
Carbon County, Wyoming
Crook County, Wyoming
Fremont, Wyoming
Hot Springs County, Wyoming
Johnson County, Wyoming
Lincoln County, Wyoming
Natrona, Wyoming
Niobrara County, Wyoming
Park County, Wyoming
Platte County, Wyoming
Sheridan County, Wyoming
Sublette County, Wyoming
Sweetwater County, Wyoming
Teton, Wyoming
Washakie County, Wyoming
Weston County, Wyoming
Uinta, Wyoming

Delta County, Colorado
Garfield County, Colorado
Grand County, Colorado
Jackson County, Colorado
Larimer County, Colorado
Mesa County, Colorado
Montrose County, Colorado
Ouray County, Colorado
Rio Blanco, Colorado
San Miguel County, Colorado

Routt County, Colorado

Bannock County, Idaho
Bear Lake County, Idaho
Bingham County, Idaho
Bonneville County, Idaho
Butte County, Idaho

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Excluded Areas
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Previously reported

Caribou County, Idaho
Clark County, Idaho
Custer County, Idaho
Franklin County, Idaho
Fremont County, Idaho
Jefferson County, Idaho
Lemhi County, Idaho
Madison County, Idaho
Oneida County, Idaho
Power County, Idaho
Teton County, Idaho

Cache County, Utah
Daggett, Utah
Duchesne, Utah
Grand County, Utah
Rich County, Utah
Uintah, Utah

Newly reported

Fallon County, MT