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April 28, 2015

Admiral David G. Simpson, Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> 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 Admiral Simpson:

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 Carter County, Montana and Custer 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**

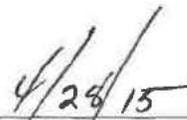
**PS Docket No. 07-114**

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 28 April 2015.



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Eric Woody, Chief Technology and Operations Officer

**Union Telephone Company**

Reason for Exclusion: Insufficient quantity, density and/or geometry  
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  
Routt County, Colorado  
San Miguel County, Colorado

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

Union Telephone Company  
Excluded Areas  
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Previously reported

Butte County, Idaho  
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

Fallon County, Montana

Newly reported

Carter County, Montana  
Custer County, Montana