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April 5, 2016

Admiral 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
Smith Bagley, Inc.

Dear Admiral Simpson:

On behalf of Smith Bagley, Inc. 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 Navajo County, Arizona, Coconino County, Arizona and Apache County, Arizona 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,



Todd Slamowitz

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: Smith Bagley, Inc.
Technology: Network-Based
Signing officer: Justin E. Hinkle, CEO/President
Address: 1500 South White Mountain Road
Show Low, AZ 85901
Telephone: (307) 782-6131

I, Justin E. Hinkle, am an officer of Smith Bagley, Inc ("SBI"). 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.

SBI uses network-based technologies to provide E911 location services. Attached hereto is an updated list of counties where SBI 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 April 5, 2016



Justin E. Hinkle, CEO/President

Smith Bagley, Inc.

Reason for Exclusion: Insufficient quantity, density and/or geometry of cell sites in the area to support network-based triangulation

Excluded Areas:

Previously reported

McKinley, NM
San Juan, NM

Newly reported

Navajo, AZ
Apache, AZ
Coconino, AZ