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February 18, 2011

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Wireless E911 Location Accuracy Requirements
PS Docket No. 07-114
Reply Comments

Dear Ms. Dortch:

South Slope Cooperative Telephone Company is a small business and Tier III CMRS carrier that operates rural GSM facilities as part of the iWireless network. We agree with T-Mobile USA and AT&T that any additional action by the Commission to revise or amend its E911 location accuracy requirements – such as eliminating the distinction between network-based and handset-based accuracy standards – would be premature and unwarranted.

The *Second Report and Order* establishes a migration path for carriers that have previously deployed a network-based E911 technology to move to a handset-based assisted-GPS (or “A-GPS”) solution. Carriers will need to achieve at least 85% penetration of A-GPS handsets within five years in order to meet the *Second Report and Order's* requirements for an average accuracy of 100 meters for 67% of calls in 100% of counties or PSAP service areas by January 2016. The handset change-out needed to implement this transition will be accomplished as rural service providers upgrade their networks to support 3G and 4G services.

T-Mobile is correct in stating the FCC should not “move the goalposts” at a time when the transition to A-GPS technology by GSM service providers has just begun. The Commission should refrain from further rule modifications at this time, and allow small businesses and rural carriers to focus their resources on satisfying the location accuracy requirements adopted last September. Instead, the Commission should allow the procedure already adopted for GSM carriers to play out, and then determine whether there is a need for further rule changes.

Respectfully submitted,

J.R. Brumley
C.E.O.

South Slope Cooperative Telephone Company