



July 28, 2011

Reinhart Boerner Van Deuren s.c.
P.O. Box 2018
Madison, WI 53701-2018

22 East Mifflin Street
Suite 600
Madison, WI 53703

Telephone: 608-229-2200
Facsimile: 608-229-2100
Toll Free: 800-728-6239
reinhartlaw.com

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: E-911 Location Accuracy Exclusion Report
PS Docket No. 07-114

Dear Ms. Dortch:

Pursuant to Section 20.18(h)(1)(F) of the Commission's Rules, 47 C.F.R. §20.18(h)(1)(F), and the FCC's *Wireless E-911 Second Report and Order*¹, NEIT Wireless, LLC ("NEIT Wireless") and NEIT Mobile, LLC ("NEIT Mobile") provide the following E-911 Location Accuracy Exclusion Report. A copy of this filing is also being sent to the National Emergency Number Association ("NENA"), the Association of Public-Safety Communications Officials-International, Inc. ("APCO"), and the National Association of State 9-1-1 Administrators ("NASNA").

NEIT Wireless provides PCS and broadband data services in Crawford County and Grant County, Wisconsin and in Allamakee County, Iowa. NEIT Mobile provides PCS and broadband data services in Clayton County and Winneshiek County, Iowa. NEIT Wireless and NEIT Mobile operate GSM networks, and utilize a network-based solution to meet the Commission's wireless handset location requirements. This report lists the counties that are excluded from the handset accuracy requirements set forth in § 20.18 of the Commission's rules. The county exclusion information is attached as Exhibit A.

The counties identified are being excluded from the FCC's accuracy requirements due to an insufficient quantity of cell sites, insufficient density of cell sites, or insufficient cell site geometry in order to perform E-911 location that

¹ *Wireless E-911 Location Accuracy Requirements*, Second Report and Order, 25 FCC Rcd 18909 (2010) ("*Wireless E-911 Second Report and Order*").

Federal Communications Commission

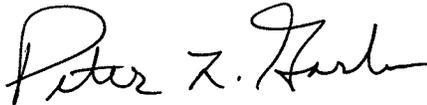
July 27, 2008

Page 2

meets the new accuracy standards. NEIT Wireless and NEIT Mobile will submit supplemental filings as needed, and in accordance with the FCC's rules, as they continue to expand and upgrade their networks.

If you have any questions concerning this matter, please feel free to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter L. Gardon". The signature is written in a cursive style with a large initial "P".

Peter L. Gardon

Enc.

cc. David Siehl (FCC, Public Safety and Homeland Security Bureau)
NENA
APCO
NASNA

EXHIBIT A

E-911 Location Accuracy Exclusion List

NEIT Mobile, LLC

NEIT Wireless, LLC

Column	Counties	State	Exclusion Type	Reason for Exclusion
NEIT Mobile, LLC FRN-0014-52-3633	Clayton	IA	Whole	1,2,3
	Winneshiek	IA	Whole	1,2,3
NEIT Wireless, LLC FRN-0014-52-3666	Allamakee	IA	Whole	1,2,3
	Crawford	WI	Whole	1,2,3
	Grant	WI	Whole	1,2,3

Category	Reason for Exclusion
1	Insufficient quantity of cell sites in the area to support network-based triangulation
2	Insufficient cell site density in the area to support network-based triangulation
3	Insufficient geometry (string-of-pearls) in the area to support network-based triangulation

Note 1: The technical information on which the E-911 Location Accuracy Exclusion List is based was gathered in part, by third party contractors.

Note 2: NEIT Wireless LLC and NEIT Mobile LLC have implemented, and tested with PSAPS, Phase-II 911 deployment on a per cell site basis in the counties identified. The Exclusion Type reported for each county is based on the insufficiency to support network-based triangulation described in this Exhibit A.

EXHIBIT B

AFFIDAVIT REGARDING E-911 LOCATION ACCURACY EXCLUSION LIST

STATE OF IOWA)
) ss.
COUNTY OF CLAYTON)

David A. Byers, being duly sworn, states as follows:

1. I am the Secretary of NEIT Wireless, LLC and NEIT Mobile, LLC.
2. I am the contact person for NEIT Wireless, LLC and NEIT Mobile, LLC concerning oversight responsibility for monitoring the status of location accuracy compliance under § 20.18(h) of the Commission's rules.
3. My title, business address and phone number are as follows:
David A. Byers
Secretary
NEIT Wireless, LLC
NEIT Mobile, LLC
800 South Main Street
Monona, IA 52159
563-539-8020
4. The information included in the E-911 Location Accuracy Exclusion Report, including Exhibit A, is complete and accurate.


DAVID A. BYERS

Subscribed and sworn to before me
this 27th day of July, 2011.



Mary Schlein, Notary Public

Clayton County, Iowa

My Commission 5-23-12