

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Wireless E911 Location Accuracy Requirements ) PS Docket No. 07-114  
 )

**WestLink Communications, LLC E911 Exclusion Report**

WestLink Communications, LLC, by its attorneys and pursuant to the FCC's Second Report and Order (FCC 10-176) in the above-captioned proceeding, as a wireless carrier employing a network-based E911 solution, hereby provides a list of the areas where it is utilizing the exclusion from compliance with Phase II accuracy requirements for particular counties, or portions of counties, where triangulation is not technically possible. Triangulation is not technically possible in the counties and portions of counties described in Appendix A attached hereto.<sup>1</sup>

Respectfully submitted,

WestLink Communications, LLC

By: /s/ Michael R. Bennet

Michael R. Bennet  
Anthony K. Veach  
Bennet & Bennet, PLLC  
4350 East West Highway, Suite 201  
Bethesda, MD 20814  
(202) 371-1500

Its Attorneys

Date: July 28, 2011

---

<sup>1</sup> Also attached, as Exhibit B, is a map depicting the portions of counties described in Appendix A. The map is provided as other explanatory information pursuant to paragraph 12 of the FCC's June 28, 2011 order. *Wireless E911 Location Accuracy Requirements*, Order, PS Docket No. 07-114, DA 11-1125 (Chief, Public Safety and Homeland Security Bureau; rel. June 28, 2011).

## Appendix A

WestLink Communications, LLC

### Exclusion Areas<sup>2</sup>

### Reason for Exclusion

Greeley County, Kansas

Insufficient number of cell sites in the area to support network-based triangulation.

Wichita County, Kansas

Insufficient number of cell sites in the area to support network-based triangulation.

Scott County, Kansas

Insufficient number of cell sites in the area to support network-based triangulation.

Lane County, Kansas

Insufficient number of cell sites in the area to support network-based triangulation.

Hodgeman County, Kansas

Insufficient number of cell sites in the area to support network-based triangulation.

Stevens County, Kansas

Insufficient number of cell sites in the area to support network-based triangulation.

Morton County, Kansas

Insufficient number of cell sites in the area to support network-based triangulation.

Gray County, Kansas

Insufficient number of cell sites in the area to support network-based triangulation.

Finney County, Kansas<sup>3</sup>

Insufficient number of cell sites in the area to support network-based triangulation.

Ford County, Kansas<sup>4</sup>

Insufficient number of cell sites in the area to support network-based triangulation.

Haskell County, Kansas<sup>5</sup>

Insufficient number of cell sites in the area to support network-based triangulation.

---

<sup>2</sup> Exclusion areas cover entire county except where indicated.

<sup>3</sup> Exclusion area covers northern half and southern quarter of county.

<sup>4</sup> Exclusion area covers northeast, southwest and southeast portions.

<sup>5</sup> Exclusion area covers northern half of county.

Exclusion Areas

Reason for Exclusion

Grant County, Kansas<sup>6</sup>

Insufficient number of cell sites in the area to support network-based triangulation.

Stanton County, Kansas<sup>7</sup>

Insufficient number of cell sites in the area to support network-based triangulation.

---

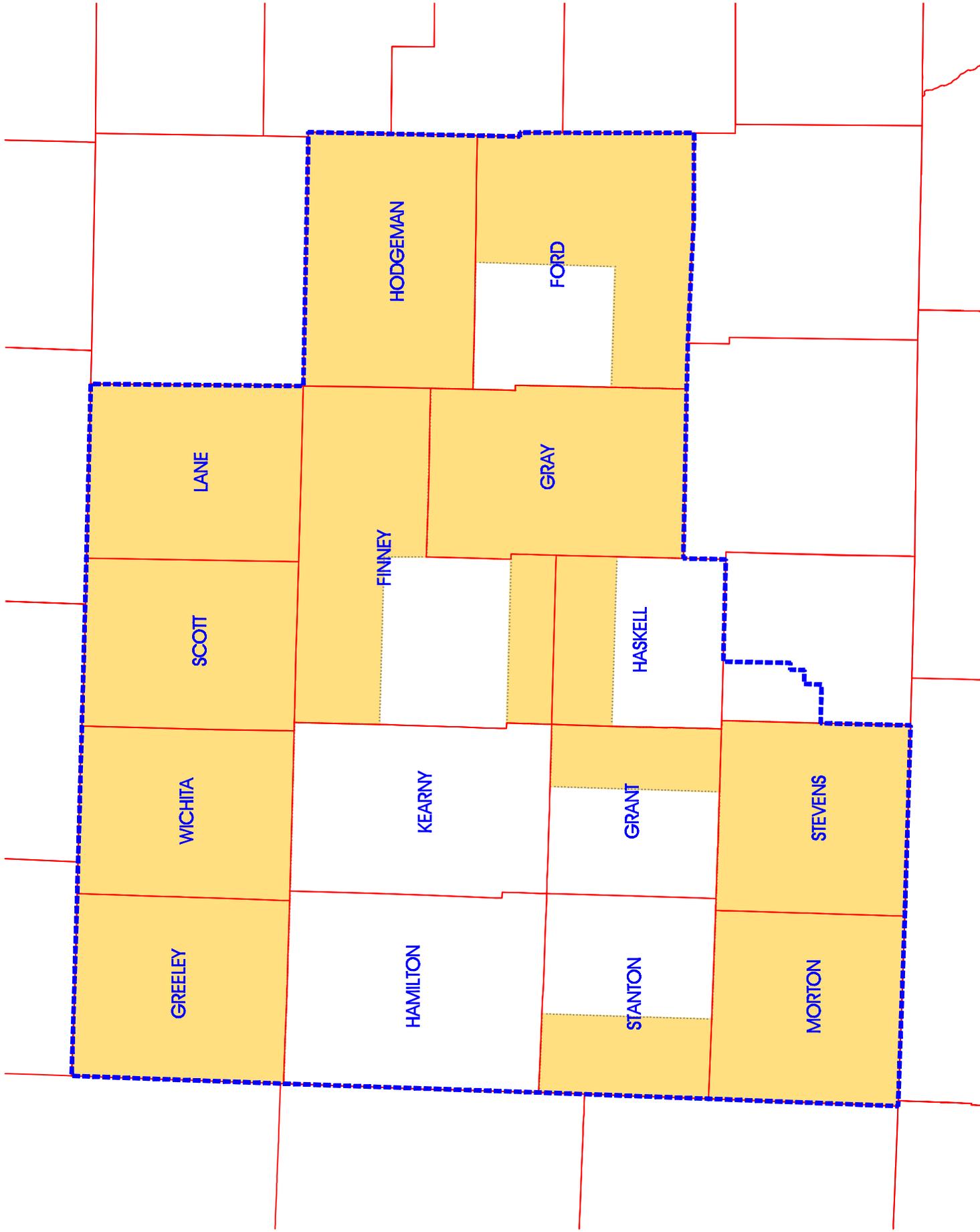
<sup>6</sup> Exclusion area covers eastern half of county.

<sup>7</sup> Exclusion area covers western half of county.

## Appendix B

WestLink Communications, LLC

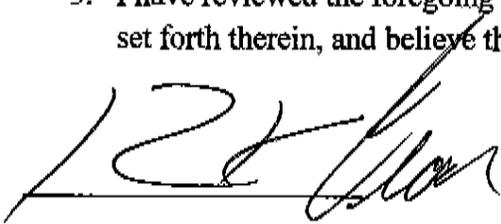
The following map depicts in yellow the exclusion areas described in Appendix A above. These areas have an insufficient number of cell sites to support triangulation.



Affidavit of Richard Veach.

I, Richard Veach, do hereby declare under penalty of perjury the following:

1. I am the Chief Executive Officer of WestLink Communications, LLC, 120 West Kansas Avenue, Ulysses, Kansas 67880, (620) 356-3211.
2. I have chief oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) of the FCC's rules.
3. I have reviewed the foregoing exclusion report. I have personal knowledge of the facts set forth therein, and believe them to be true and correct.

A handwritten signature in black ink, appearing to read "Richard Veach", written over a horizontal line.

Richard Veach

July 27, 2011

Date