

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

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

Wisconsin RSA #7 Limited Partnership E911 Exclusion Report

Wisconsin RSA #7 Limited Partnership d/b/a Element Mobile (“Element”), by its attorneys and pursuant to the FCC’s Second Report and Order (FCC 10-176) in the above-captioned proceeding, hereby provides a list of the areas where it is utilizing the exclusion from compliance with Phase II accuracy requirements. Element employs a handset-based E911 solution. Based on heavy forestation, Element excludes the counties listed on Appendix A from compliance¹.

Because handset-based E911 solutions must by necessity default to a network-based solution in instances where the handset is unable to see the GPS signal, in such instances Element asserts an exclusion for its entire service area² as it is unable to triangulate throughout its service area.

Respectfully submitted,

WISCONSIN RSA #7 LIMITED PARTNERSHIP

By: /s/ Michael R. Bennet

Michael R. Bennet
Bennet & Bennet, PLLC
4350 East West Highway, Suite 201
Bethesda, MD 20814
(202) 551-0011

Its Attorney

Date: July 28, 2011

¹ Element recognizes that pursuant to the Second Report and Order, it may only exclude up to 15 percent of counties or PSAP areas from the 150 meter requirement based upon heavy forestation. Element provides service to nine counties so, as currently written, the exclusion may apply to only one county served by Element. Absent changes to its service area, improvements in E911 technology, or changes to the requirement, Element expects to seek a waiver for the heavily forested counties cited herein which will not qualify for the exclusion.

² Element’s service area covers all or part of the following Wisconsin counties: Wood, Portage, Waupaca, Waushara, Green Lake, Marquette, Adams, Juneau and Monroe.

Appendix A

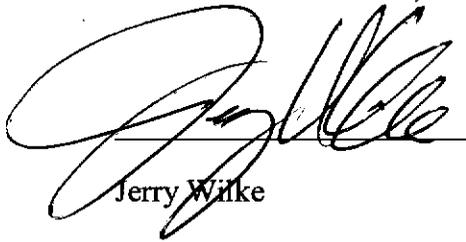
Wisconsin RSA #7 Limited Partnership d/b/a Element Mobile

<u>Exclusion Areas</u>	<u>Reason for Exclusion</u>
Juneau County, Wisconsin	GPS-assisted location accuracy is limited due to heavy forestation
Adams County, Wisconsin	GPS-assisted location accuracy is limited due to heavy forestation
Wood County, Wisconsin	GPS-assisted location accuracy is limited due to heavy forestation
Wood County, Wisconsin	Insufficient number of cell sites in the area to support network-based triangulation.
Portage County, Wisconsin	Insufficient number of cell sites in the area to support network-based triangulation.
Waupaca County Wisconsin	Insufficient number of cell sites in the area to support network-based triangulation.
Waushara County, Wisconsin	Insufficient number of cell sites in the area to support network-based triangulation.
Green Lake County, Wisconsin	Insufficient number of cell sites in the area to support network-based triangulation.
Marquette County, Wisconsin	Insufficient number of cell sites in the area to support network-based triangulation.
Adams County, Wisconsin	Insufficient number of cell sites in the area to support network-based triangulation.
Juneau County, Wisconsin	Insufficient number of cell sites in the area to support network-based triangulation.
Monroe County, Wisconsin	Insufficient number of cell sites in the area to support network-based triangulation.

Affidavit of Jerry Wilke

I, Jerry Wilke, do hereby declare under penalty of perjury the following:

1. I am the Chief Operating Officer of Wisconsin RSA #7 Limited Partnership d/b/a Element Mobile, 440 East Grand Avenue, P.O. Box 8020, Wisconsin Rapids, Wisconsin 54494-8020, (715) 818-5423.
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.



Jerry Wilke

7/25/11

Date