

July 28, 2011

Margaret M. Fox

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VIA ELECTRONIC FILING

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

Re: Wireless E911 Location Accuracy Requirements Second Report and
Order - PS Docket 07-114

Dear Ms. Dortch:

As required in the Wireless E911 Location Accuracy Requirements Second Report and Order, and pursuant to DA 11-1125 extending the time for filing Exclusion Reports, we are filing this Exclusion Report on behalf of North State Telephone Company d/b/a North State Communications (“North State Communications”).

Pursuant to 47 C.F.R. Section 20.18(h)(1)(F), as amended in the Second Report and Order, a carrier may exclude from the E911 location accuracy compliance standards “particular counties, or portions of counties, where triangulation is not technically possible . . .” The Commission later clarified in DA 11-1125 that carriers should include in the report a description of whether the carrier is using network-based or handset-based technologies at the time of filing, as well as a supporting affidavit from an officer or director of the wireless carrier who serves as the official or contact person having chief oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h). The order further provides that the Report should include a table or appendix with the list of counties or portions of counties, or PSAP service areas, for which the wireless carrier is claiming an exclusion, along with a brief description of the reason for the exclusion. Finally, the order provides that carriers may include other explanatory information in their Exclusion Reports to support their selection of the excluded areas.

In accordance with the Commission’s orders, we submit this Exclusion Report, which consists of the narrative information contained herein; the attached table listing the areas for which North State Communications is claiming an exclusion, along with a brief description of the reason for the exclusion; and the attached supporting affidavit of James D. McC Carson. We also provide the following information:

McNair Law Firm, P. A.
1221 Main Street
Suite 1600
Columbia, SC 29201

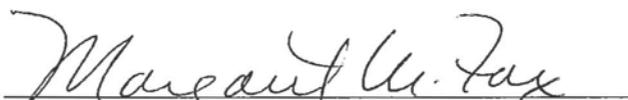
Mailing Address
Post Office Box 11390
Columbia, SC 29211

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North State Communications is currently using a network-based technology. North State Communications is a small wireless carrier serving portions of 4 counties near and around High Point, North Carolina. The exclusions listed on the attachment represent 4 census blocks of service territory where tower sitings were developed upon population clusters in the rural areas.

As directed in DA 11-1125, we are providing copies of this Report to the National Emergency Number Association, the Association of Public-Safety Communications Officials-International, and the National Association of State 9-1-1 Administrators.

Sincerely,



M. John Bowen, Jr.
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Columbia, SC 29211
Telephone: (803) 799-9800
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MMF:rwm

cc: James D. McCarson, North State Communications
Trey Fogerty, Director of Government Affairs, National Emergency Number Association,
tfogerty@nena.org
Stephen J. Wisely, Director Comm Center & 9-1-1 Services Department, The Association
of Public Safety Communications Officials-International (APCO),
Wiselys@apointl.org
Richard Taylor, The National Association of State 9-1-1 Administrators (NASNA),
richard.taylor@nc.gov

NORTH STATE COMMUNICATIONS - E911 PHASE II COUNTY EXCLUSION LIST

7/28/2011

EXPLANATION LEGEND

1. Stand Alone Sites: The county contains an isolated stand-alone site that preclude triangulation
2. String of Pearls: There are multiple sites located in a linear string that do not allow for triangulation
3. Terrain: The terrain, including, but not limited to mountains areas, prevents a sufficient number of LMUs from contributing to location attempts
4. Distance: There are multiple sites but the distance between them is too great for LMUs to contribute with each other

State	County	FIPS Code	Explanation
NC	Davidson	3705791028	Excluded - Distance
NC	Davidson	3705790756	Excluded - Distance
NC	Randolph	3715190116	Excluded - Distance
NC	Randolph	3715193208	Excluded - Distance

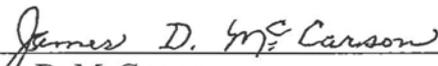
STATE OF NORTH CAROLINA

COUNTY OF GUILFORD

PERSONALLY APPEARED BEFORE ME the undersigned WHO, BEING DULY
SWORN, deposed and said:

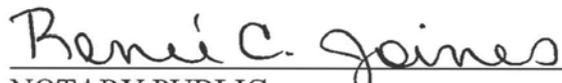
1. My name is James D. McCarson. I am employed by North State Telephone Company dba North State Communications (the "Company") as its Vice President and Chief Technology Officer. I am an officer of the Company and have chief oversight responsibility for monitoring the overall status of location accuracy compliance under 47 C.F.R. § 20.18(h).
2. I hereby declare in support of North State Telephone Company dba North State Communications E911 Phase II County Exclusion List attached above (the "Exclusion List"), that the counties or portions of counties identified in the Exclusion List contain areas where triangulation of the geographical position of a 911 emergency call is not technically possible. I have reviewed the Exclusion List and the process used to create it and declare under penalty of perjury that the information contained therein is accurate to the best of my knowledge, information, and belief.

FURTHER AFFIANT SAYETH NOT.



James D. McCarson
Vice President & Chief Technology Officer
North State Telephone Company dba
North State Communications
111 N. Main Street
High Point, North Carolina 27260
336-886-3628

Subscribed to and sworn before me this 26th day of July 2011.



NOTARY PUBLIC

Renee C. Joines

Printed Name of Notary

My Commission Expires: December 4, 2013