

Margaret M. Fox

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July 28, 2011

**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 Piedmont Rural Telephone Cooperative, Inc., d/b/a PRTCcommunications, LLC ("PRTC").

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 PRTC is claiming an exclusion, along with a brief description of the reason for the exclusion; and the attached supporting affidavit of Gregg A. Cohn. 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

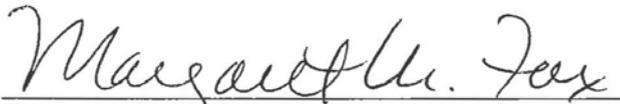
mcnair.net

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PRTC is currently using a network-based technology. PRTC is a small wireless carrier serving predominantly rural areas in South Carolina. PRTC's service area includes all of Laurens County and a small portion of Spartanburg County. The excluded areas are generally sparsely populated or encompass large national forest 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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MMF:rwm

cc: Gregg A. Cohn, PRTCommunications, LLC  
Richard Sullivan, PRTCommunications, LLC  
Trey Forgety, Director of Government Affairs, National Emergency Number Association,  
[tfogerty@nena.org](mailto: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](mailto:Wiselys@apointl.org)  
Richard Taylor, The National Association of State 9-1-1 Administrators (NASNA),  
[richard.taylor@nc.gov](mailto:richard.taylor@nc.gov)

# Piedmont Rural Telephone Cooperative, Inc. (d/b/a PRTCommunications, LLC) - E911 PHASE II COUNTY EXCLUSION

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
SC	LAURENS	45059	Excluded - String of Pearls along River Fork Road from the intersection of River Fork Road and Hwy 221 South to the intersection of River Fork Road and Indian Mound Road.
SC	LAURENS	45059	Excluded - String of Pearls East of Hwy 72 traveling between Hwy 39 and Hwy 76 along SC Hwy 560 and Hwy 56.
SC	LAURENS	45059	Excluded - String of Pearls Northeast of I26 traveling along the Laurens County border and the Sumter National Forest between Hwy 66 and Hwy 49.

STATE OF SOUTH CAROLINA

COUNTY OF LAURENS

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

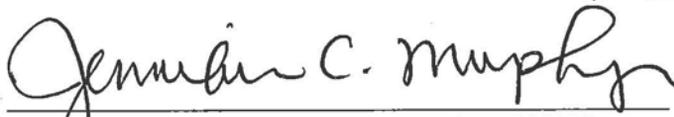
1. My name is Gregg A. Cohn. I am employed by Piedmont Rural Telephone Cooperative, Inc., d/b/a PRTCommunications, LLC (the "Company") as its General Manager - Operations. I am a manager of the Company and have chief oversight responsibility for monitoring the overall status of location accuracy compliance under 47 C.F.R. § 20.18(h).

2. I hereby declare in support of Piedmont Rural Telephone Cooperative, Inc., d/b/a PRTCommunications, LLC 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.

  
Gregg A. Cohn  
General Manager - Operations  
PRTCommunications, LLC  
PO Box 249, 201 Anderson Drive  
Laurens, SC 29360  
864-682-3131

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

  
NOTARY PUBLIC FOR SOUTH CAROLINA

Jennifer C. Murphy  
Printed Name of Notary

My Commission Expires: 8/25/19