

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 Comporium Wireless (“Comporium”).

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 Comporium is claiming an exclusion, along with a brief description of the reason for the exclusion; and the attached supporting affidavit of Mike W. Deller. We also provide the following information:

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

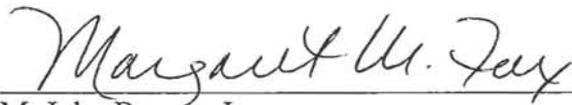
Mailing Address
Post Office Box 11390
Columbia, SC 29211

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Comporium is currently using a network-based technology. Comporium is a small carrier committed to serving towns and rural areas in South Carolina, predominantly in York and Lancaster Counties with small pockets in Chester and Kershaw Counties. Comporium has been aggressive in serving its area with 96 cell sites currently in service. All of its sites have E911 Phase II equipment and all but a handful are 3G. In Comporium's widespread service area, there are a very few rural areas that may not have full triangulation abilities. As Comporium provides service in only four counties, the county exclusion criteria is not relevant for Comporium. Therefore, Comporium is filing the attached exclusion list of those few areas with specific coordinate boundaries.

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: Mike W. Deller, Comporium Wireless
Trey Forgety, 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

Comporium - E911 PHASE II COUNTY EXCLUSION LIST

7/27/2011

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. Terrian: 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

Northwest Latitude	Northwest Longitude	Northeast Latitude	Northeast Longitude	Southwest Latitude	Southwest Longitude	Southeast Latitude	Southeast Longitude	State	County	FIPS Code	Explanation
35.071982	-81.390007	35.071972	-81.341146	35.038702	-81.395994	34.037107	-81.339185	SC	York County	45091	Excluded - Stand Alone Site
34.988157	-81.442428	34.990912	-81.384745	34.954854	-81.440978	34.953726	-81.383463	SC	York County	45091	Excluded - Stand Alone Site
34.888243	-81.255145	34.889491	-81.202684	34.85529	-81.255049	34.855246	-81.197223	SC	York County	45091	Excluded - Stand Alone Site
34.609041	-80.865419	34.61187	-80.820975	34.567701	-80.865301	34.566437	-80.818011	SC	Lancaster County	45057	Excluded - Stand Alone Site
34.702949	-80.662303	34.694282	-80.605749	34.668024	-80.665618	34.666346	-80.607434	SC	Lancaster County	45057	Excluded - Stand Alone Site
34.459127	-80.813587	34.453886	-80.760306	34.418557	-80.817319	34.42148	-80.758971	SC	Kershaw County	45055	Excluded - Stand Alone Site

STATE OF SOUTH CAROLINA

COUNTY OF YORK

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

1. My name is Mike W. Deller. I am employed by Comporium (the "Company") as its Vice President of Engineering and Planning. 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 Comporium Wireless' 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.

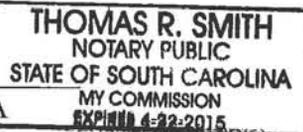


Mike W. Deller
VP- Engineering and Planning
Comporium Wireless
P.O. Box 470
471A Lakeshore Pkwy
Rock Hill, SC 29730
(803) 326-7109

Subscribed to and sworn before me this 27 day of JULY 2011.



NOTARY PUBLIC FOR SOUTH CAROLINA



THOMAS R. SMITH
Printed Name of Notary

My Commission Expires: 4-22-15