

July 28, 2011

Margaret M. Fox

pfox@mcnair.net  
T (803) 799-9800  
F (803) 753-3219

**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 FTC Communications, LLC ("FTC 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 FTC Communications is claiming an exclusion, along with a brief description of the reason for the exclusion; and the attached supporting affidavit of Guy Dent Adams, Jr. 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

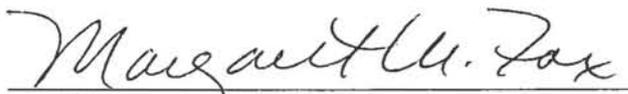
mcnair.net

---

FTC Communications is currently using a network-based technology. FTC Communications is a small wireless carrier serving predominantly rural areas in South Carolina. FTC Communications' service area includes Williamsburg, Clarendon, Sumter, and Lee Counties, and a portion of Florence County. The area being excluded by FTC Communications is sparsely populated, and represents a small portion of the carrier's wireless service area.

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.  
Margaret M. Fox  
McNair Law Firm, P.A.  
P O Box 11390  
Columbia, SC 29211  
Telephone: (803) 799-9800  
Facsimile: (803) 753-3278  
Email: jbowen@mcnair.net; pfox@mcnair.net

MMF:rwm

cc: Guy Dent Adams, Jr., FTC Communications  
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@apcointl.org](mailto:Wiselys@apcointl.org)  
Richard Taylor, The National Association of State 9-1-1 Administrators (NASNA),  
[richard.taylor@nc.gov](mailto:richard.taylor@nc.gov)

# FTC COMMUNICATIONS, LLC - 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. 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

State	County	FIPS Code	Explanation
SC	Williamsburg	45089	Excluded - Distance - Heading southeast on SR-45 between Hwy 377 and SR-41, the sites are 11.8 miles apart.
SC	Williamsburg	45089	Excluded - String of Pearls - Heading south from the intersection of SR-41 and Hwy 521, sites don't allow for triangulation.
SC	Williamsburg	45089	Excluded - Terrain - Area along Big Woods Road between SC-S-45-218 and Campbell's Road.
SC	Clarendon	45027	Excluded - Distance - Area between Hwy 260 and S. Brewington Road

STATE OF SOUTH CAROLINA

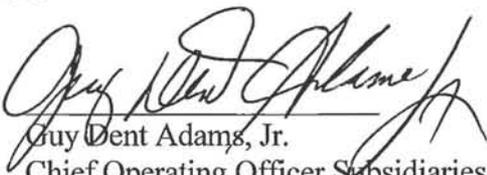
COUNTY OF WILLIAMSBURG

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

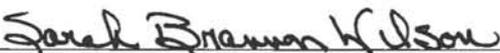
1. My name is Guy Dent Adams, Jr. I am employed by FTC COMMUNICATIONS, LLC (the "Company") as its Chief Operating Officer Subsidiaries. I am an officer of the Company and have chief oversight responsibility for monitoring the overall status of location accuracy compliance under 47 C.F.R. § 20.18(h).

2. I hereby declare in support of FTC COMMUNICATIONS, LLC's 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.

  
Guy Dent Adams, Jr.  
Chief Operating Officer Subsidiaries  
FTC Communications, LLC  
1101 E. Main Street  
Kingstree, SC 29556  
843-382-8700

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

  
NOTARY PUBLIC FOR SOUTH CAROLINA

  
Printed Name of Notary:

My Commission Expires: March 26, 2017