

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Wireless E911 Location Accuracy Requirements	)	PS Docket No. 07-114
	)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems	)	
	)	
	)	
	)	
	)	

**EXCLUSION REPORT OF UNITED STATES CELLULAR CORPORATION**

Pursuant to the Public Safety and Homeland Security Bureau's June 28, 2011 Order ("*Exclusion Report Order*") extending the filing deadline and providing clarification as to the contents of the filing, United States Cellular Corporation ("USCC") hereby submits this Exclusion Report.<sup>1</sup>

USCC uses handset-based technologies to provide E-911 service to its customers, and to comply with the Federal Communications Commission's E-911 location accuracy requirements. USCC therefore can exclude up to 15 percent of counties or Public Service Answering Points ("PSAP") services areas from the current 150 meter location accuracy standard due to heavy forestation.<sup>2</sup> The USCC officer who serves as the official with chief oversight responsibility for

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<sup>1</sup> *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, *Order* (June 28, 2011).

<sup>2</sup> *Exclusion Report Order*, ¶ 8.

E-911 location accuracy compliance under Section 20.18(h) is Jeff Baenke, Senior Director, Technology Development Group. An affidavit from Mr. Baenke is attached as Appendix A.

USCC provides Phase II service to 705 counties and has listed below 78 counties, approximately 11 percent of the counties USCC serves and well below 15 percent of counties, as eligible for exclusion. Determination of whether a county is heavily forested was made using data from the U.S. Department of Agriculture Forest Service’s Forest Inventory and Analysis National Program (“USDA FIANP”).<sup>3</sup> USCC also has utilized current accuracy testing results for these counties, and notes that some counties listed actually may meet the FCC’s location accuracy standards. USCC and its vendors continue to strive to provide effective E-911 location services, as well to meet Phase II accuracy requirements wherever possible. USCC will update its Exclusion Report pursuant to Section 20.18(h)(2)(iii) to reflect any changes.

The following table contains the counties in the service area that USCC currently deems heavily forested and excluded from the E-911 Phase II accuracy requirements due to forestation:

<b>County</b>	<b>State</b>	<b>Reason County Excluded</b>
DEL NORTE	CA	GPS-assisted location accuracy is limited due to heavy forestation. <sup>4</sup>
HUMBOLDT	CA	GPS-assisted location accuracy is limited due to heavy forestation.
MENDOCINO	CA	GPS-assisted location accuracy is limited due to heavy forestation.
PLUMAS	CA	GPS-assisted location accuracy is limited due to heavy forestation.
SISKIYOU	CA	GPS-assisted location accuracy is limited due to heavy forestation.
TRINITY	CA	GPS-assisted location accuracy is limited due to heavy forestation.
AROOSTOOK	ME	GPS-assisted location accuracy is limited due to heavy forestation.
FRANKLIN	ME	GPS-assisted location accuracy is limited due to heavy forestation.
HANCOCK	ME	GPS-assisted location accuracy is limited due to heavy forestation.
OXFORD	ME	GPS-assisted location accuracy is limited due to heavy forestation.
PENOBSCOT	ME	GPS-assisted location accuracy is limited due to heavy forestation.
PISCATAQUIS	ME	GPS-assisted location accuracy is limited due to heavy forestation.
SOMERSET	ME	GPS-assisted location accuracy is limited due to heavy forestation.
WALDO	ME	GPS-assisted location accuracy is limited due to heavy forestation.
WASHINGTON	ME	GPS-assisted location accuracy is limited due to heavy forestation.

<sup>3</sup> See Forest Inventory and Analysis National Program, <http://fia.fs.fed.us/>.

<sup>4</sup> The *Exclusion Report Order*, ¶ 11, gives this description as an example of the type of brief description the Bureau is seeking.

<b>County</b>	<b>State</b>	<b>Reason County Excluded</b>
IRON	MO	GPS-assisted location accuracy is limited due to heavy forestation.
MADISON	MO	GPS-assisted location accuracy is limited due to heavy forestation.
CHEROKEE	NC	GPS-assisted location accuracy is limited due to heavy forestation.
HAYWOOD	NC	GPS-assisted location accuracy is limited due to heavy forestation.
JACKSON	NC	GPS-assisted location accuracy is limited due to heavy forestation.
LEE	NC	GPS-assisted location accuracy is limited due to heavy forestation.
MACON	NC	GPS-assisted location accuracy is limited due to heavy forestation.
MADISON	NC	GPS-assisted location accuracy is limited due to heavy forestation.
MCDOWELL	NC	GPS-assisted location accuracy is limited due to heavy forestation.
ONslow	NC	GPS-assisted location accuracy is limited due to heavy forestation.
WARREN	NC	GPS-assisted location accuracy is limited due to heavy forestation.
YANCEY	NC	GPS-assisted location accuracy is limited due to heavy forestation.
CARROLL	NH	GPS-assisted location accuracy is limited due to heavy forestation.
CHESHIRE	NH	GPS-assisted location accuracy is limited due to heavy forestation.
COOS	NH	GPS-assisted location accuracy is limited due to heavy forestation.
GRAFTON	NH	GPS-assisted location accuracy is limited due to heavy forestation.
MERRIMACK	NH	GPS-assisted location accuracy is limited due to heavy forestation.
ROCKINGHAM	NH	GPS-assisted location accuracy is limited due to heavy forestation.
LATIMER	OK	GPS-assisted location accuracy is limited due to heavy forestation.
COOS	OR	GPS-assisted location accuracy is limited due to heavy forestation.
CURRY	OR	GPS-assisted location accuracy is limited due to heavy forestation.
DOUGLAS	OR	GPS-assisted location accuracy is limited due to heavy forestation.
GRANT	OR	GPS-assisted location accuracy is limited due to heavy forestation.
JACKSON	OR	GPS-assisted location accuracy is limited due to heavy forestation.
JOSEPHINE	OR	GPS-assisted location accuracy is limited due to heavy forestation.
KLAMATH	OR	GPS-assisted location accuracy is limited due to heavy forestation.
PIKE	PA	GPS-assisted location accuracy is limited due to heavy forestation.
BRADLEY	TN	GPS-assisted location accuracy is limited due to heavy forestation.
CAMPBELL	TN	GPS-assisted location accuracy is limited due to heavy forestation.
FENTRESS	TN	GPS-assisted location accuracy is limited due to heavy forestation.
MORGAN	TN	GPS-assisted location accuracy is limited due to heavy forestation.
SCOTT	TN	GPS-assisted location accuracy is limited due to heavy forestation.
SEVIER	TN	GPS-assisted location accuracy is limited due to heavy forestation.
ALLEGHANY	VA	GPS-assisted location accuracy is limited due to heavy forestation.
AMHERST	VA	GPS-assisted location accuracy is limited due to heavy forestation.
BATH	VA	GPS-assisted location accuracy is limited due to heavy forestation.
BUCKINGHAM	VA	GPS-assisted location accuracy is limited due to heavy forestation.
CRAIG	VA	GPS-assisted location accuracy is limited due to heavy forestation.
GILES	VA	GPS-assisted location accuracy is limited due to heavy forestation.
BENNINGTON	VT	GPS-assisted location accuracy is limited due to heavy forestation.
CALEDONIA	VT	GPS-assisted location accuracy is limited due to heavy forestation.
LAMOILLE	VT	GPS-assisted location accuracy is limited due to heavy forestation.
ORANGE	VT	GPS-assisted location accuracy is limited due to heavy forestation.
RUTLAND	VT	GPS-assisted location accuracy is limited due to heavy forestation.
WASHINGTON	VT	GPS-assisted location accuracy is limited due to heavy forestation.
WINDHAM	VT	GPS-assisted location accuracy is limited due to heavy forestation.
WINDSOR	VT	GPS-assisted location accuracy is limited due to heavy forestation.

County	State	Reason County Excluded
COWLITZ	WA	GPS-assisted location accuracy is limited due to heavy forestation.
GRAYS HARBOR	WA	GPS-assisted location accuracy is limited due to heavy forestation.
LEWIS	WA	GPS-assisted location accuracy is limited due to heavy forestation.
MASON	WA	GPS-assisted location accuracy is limited due to heavy forestation.
PACIFIC	WA	GPS-assisted location accuracy is limited due to heavy forestation.
SKAMANIA	WA	GPS-assisted location accuracy is limited due to heavy forestation.
WAHIAKUM	WA	GPS-assisted location accuracy is limited due to heavy forestation.
FAYETTE	WV	GPS-assisted location accuracy is limited due to heavy forestation.
HARDY	WV	GPS-assisted location accuracy is limited due to heavy forestation.
MERCER	WV	GPS-assisted location accuracy is limited due to heavy forestation.
NICHOLAS	WV	GPS-assisted location accuracy is limited due to heavy forestation.
RALEIGH	WV	GPS-assisted location accuracy is limited due to heavy forestation.
RANDOLPH	WV	GPS-assisted location accuracy is limited due to heavy forestation.
SUMMERS	WV	GPS-assisted location accuracy is limited due to heavy forestation.
TUCKER	WV	GPS-assisted location accuracy is limited due to heavy forestation.
WEBSTER	WV	GPS-assisted location accuracy is limited due to heavy forestation.

Pursuant to ¶ 16 of the *Exclusion Report Order*, copies of USCC's Exclusion Report have also been sent to the National Emergency Number Association, the Association of Public-Safety Communications Officials, and the National Association of 9-1-1 Administrators.

Respectfully submitted,



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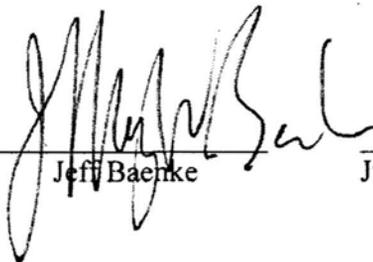
Its Attorneys

July 28, 2011

**Appendix A – Declaration of Jeff Baenke**

I, Jeff Baenke, am Senior Director, Technology Development Group for U.S. Cellular Corporation. I serve as the official with chief oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) of the Federal Communications Commission's rules. My office address is 8410 W. Bryn Mawr Avenue, Chicago, Illinois 60631 and office phone number is (773)399-8900.

The foregoing Exclusion Report and the analyses of USCC's heavily forested areas was prepared under my direction and is true and accurate to the best of my knowledge, information and belief.

  
Jeff Baenke      7/28/2011  
July 28, 2011

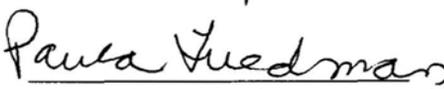
## CERTIFICATE OF SERVICE

I hereby certify on this 28<sup>th</sup> day of July, 2011, I caused a copy of the foregoing Exclusion Report of United States Cellular Corporation to be served by electronic mail on the following parties:

Trey Forgety  
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Paula Friedman