



221 E. Fourth Street
Suite 103-1280
Cincinnati, Ohio 45202

July 28, 2011

Filed Electronically

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

RE: Cincinnati Bell Wireless LLC's Exclusion Report
Docket No. 07-114

Dear Ms. Dortch:

Pursuant to the Commission's Wireless E911 Location Accuracy Requirements, *Second Report and Order* (rel. September 23, 2010) and *Order* (rel. June 28, 2011), PS Docket No. 07-114, Cincinnati Bell Wireless LLC ("CBW") hereby submits the its Exclusion Report to identify those counties or portions of counties where triangulation of the geographical position of a 911 emergency call is not technically possible using CBW's network-based location technologies.

CBW is a regional, facilities-based, wireless service provider which holds Broadband PCS and AWS licenses covering the greater Cincinnati and Dayton metropolitan areas as well as several counties in northern Kentucky and Indiana. CBW employs network-based technologies to comply with Section 20.18(h), which specifies the network-based standards for E911 Phase II location accuracy and reliability.

As set forth in the attached Table, CBW hereby notifies the Commission and other interested parties that it seeks to exclude the identified counties or portions of counties from compliance with the location accuracy requirements. CBW will be unable to comply with the location accuracy requirements in the identified areas because there are not at least three cell sites in these areas by which to triangulate the 911 caller's location.

Any questions about this report should be directed to me at (513) 397-7260 or by email at jouett.brenzel@cinbell.com.

Sincerely,

A handwritten signature in blue ink that reads "Jouett K. Brenzel".

Jouett K. Brenzel

Attachments

AFFIDAVIT OF RICHARD P. BENKEN

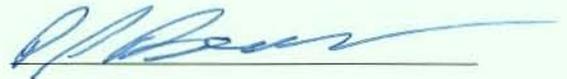
Comes now the Affiant, Richard P. Benken, and having first been duly cautioned and sworn, states as follows:

1. I am the Managing Director for Wireless Network Operations for Cincinnati Bell Wireless LLC ("CBW"). My business address is 221 E. Fourth Street, MS 307, Cincinnati, Ohio 45202, and my direct contact number is (513) 566-3090.

2. I have been employed by Cincinnati Bell for 25 years. For the last 5 years, I have had direct oversight responsibility for monitoring the overall status of the location accuracy compliance under Section 20.18(h).

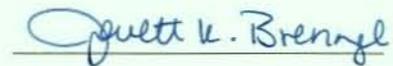
3. I have reviewed the information contained in CBW's Exclusion Report, and I hereby confirm that it accurately represents the counties or portions of counties in CBW's service area where there is an insufficient number of cell sites in those areas by which to triangulate a 911 caller's location.

FURTHER AFFIANT SAYETH NAUGHT.



Richard P. Benken

Sworn to before me and subscribed in my presence by the said Richard P. Benken on this 28 day of July, 2011.



Notary Public

JOUETT K. BRENZEL
ATTORNEY AT LAW
Notary Public, State of Ohio
My Commission Has No Expiration
Section 147.03 R.C.

**EXCLUSION REPORT
OF
CINCINNATI BELL WIRELESS LLC**

Cincinnati Bell Wireless LLC ("CBW") seeks to exclude each of the counties in the table below, in their entirety, because there is an insufficient number of cell sites visible to the handset of a 911 caller in these counties to support network-based triangulation of the 911 caller's location.

Counties	No. of sites
Bracken, KY	1
Brown, OH	2
Champaign, OH	2
Ohio, IN	1
Ripley, IN	2
Switzerland, IN	1

CBW also seeks to exclude portions of Gallatin County, Kentucky, and Pendleton County, Kentucky. A map of each county showing the areas to be excluded is attached hereto as Exhibits 1 and 2. In each of the outlined areas, there is an insufficient number of cell sites visible to the handset of a 911 caller to support network-based triangulation of the caller's location.

EXHIBIT 2

PENDLETON COUNTY, KENTUCKY

