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17 November 2011

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
12th Street S.W.
Washington, D.C. 20554

Re: Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114

Dear Ms. Dortch:

Pursuant to the *Second Report and Order* (FCC 10-176) in the above-captioned proceeding, T-Mobile USA, Inc. (“T-Mobile”) hereby submits this update to its Exclusion Report, filed 28 July 2011. Because T-Mobile is currently using network-based technologies, its updated Exclusion Report lists those counties or portions of counties in which triangulation of the geographical position of a 911 emergency call is not technically possible. Those counties or portions of counties that are listed in the attached updated Exclusion Report are excluded because of insufficient quantity, density, and/or geometry of cell sites in those areas to support network-based triangulation.

T-Mobile has attached a revised Exclusion Report to this letter, listing all excluded counties and portions of counties. The 38 counties that have been added or changed are marked by bold and italic text. T-Mobile has also attached a separate list indicating those counties that have been removed from its Exclusion Report. T-Mobile’s resulting Exclusion Report now contains 195 exclusions of whole counties and 155 exclusions of portions of counties. This list is subject to further update. A supporting affidavit from Mark McDiarmid, Vice President, is also attached.

Should you have any questions about this filing, please feel free to contact me at (202) 730-1338.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'KLD', with a horizontal line extending to the right.

Kristine Laudadio Devine
Counsel for T-Mobile USA Inc.

Attachment

CC: Trey Forgety, NENA
Stephen J. Wisely, APCO
Richard Taylor, NASNA

CERTIFICATE OF SERVICE

I hereby certify on this 17th day of November, 2011, I caused a copy of the foregoing Exclusion Report of T-Mobile USA, Inc. to be served by electronic mail on the following parties:

Trey Forgety
Director of Government Affairs
National Emergency Number Association
tforgety@nena.org

Stephen J. Wisely
Director Comm Center & 9-1-1 Services Department
The Association of Public-Safety Communications Officials-International
wisely@apointl.org

Richard Taylor
The National Association of State 9-1-1 Administrators
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Kristine Laudadio Devine