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January 5, 2012

James Arden Barnett, Jr., Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room 7-C485  
Washington, D.C. 20554

Re: PS Docket No. 07-114  
E911 Location Accuracy Exclusion Report  
Union Telephone Company

Dear Mr. Barnett:

On behalf of Union Telephone Company submitted herewith is the wireless carrier's E911 Location Accuracy Exclusion Report, pursuant to FCC Rule Section 20.18(h)(1)(vi) for carriers using network-based technologies. The Exclusion Report lists counties in which triangulation of the geographical position of a 911 emergency call is not technically possible because of insufficient quantity, density and/or geometry of cell sites to support network-based triangulation that meets the accuracy standards.

Should any questions arise with respect to this matter, please communicate directly with this office.

Very truly yours,



Pamela L. Gist

cc: National Emergency Number Association (by email)  
Association of Public-Safety Communications Officials-International (by email)  
National Association of State 9-1-1 Administrators (by email)

**Affidavit in Support of E911 Location Accuracy Exclusion Report**

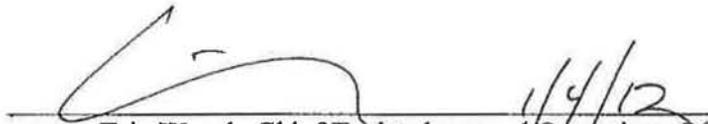
**PS Docket No. 07-114**

Carrier: Union Telephone Company  
Technology: Network-based  
Signing officer: Eric Woody Chief Technology and Operations Officer  
Address: P. O. Box 160  
Mountain View, Wyoming 82939  
Telephone: (307) 782-6131

I, Eric Woody, am an officer of Union Telephone Company. I have chief oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) of the rules of the Federal Communications Commission.

Union Telephone Company uses network-based technologies to provide E911 Phase II location services. Attached hereto is a list of counties where Union Telephone Company is utilizing the FCC Rule Section 20.18(h)(1)(vi) exclusion from the location accuracy standards for network-based technologies, where triangulation is not technically possible.

In accordance with 47 C.F.R. § 1.16(2), I declare under penalty of perjury that the foregoing is true and correct. Executed on

  
Eric Woody Chief Technology and Operations Officer 1/4/12

**Union Telephone Company**

Reason for Exclusion: Insufficient number of cell sites in the area  
to support network-based triangulation

Excluded Areas:

Wyoming

Big Horn	County	Wyoming
Crook	County	Wyoming
Hot Springs	County	Wyoming
Niobrara	County	Wyoming
Park	County	Wyoming
Sheridan	County	Wyoming
Washakie	County	Wyoming
Weston	County	Wyoming

Colorado

Delta	County	Colorado
Garfield	County	Colorado
Jackson	County	Colorado
Larimer	County	Colorado
Mesa	County	Colorado
Montrose	County	Colorado
Ouray	County	Colorado
San Miguel	County	Colorado

Idaho

Bannock	County	Idaho
Bear Lake	County	Idaho
Bingham	County	Idaho
Bonneville	County	Idaho
Butte	County	Idaho
Caribou	County	Idaho
Clark	County	Idaho
Custer	County	Idaho
Franklin	County	Idaho
Fremont	County	Idaho
Jefferson	County	Idaho
Lemhi	County	Idaho
Madison	County	Idaho
Oneida	County	Idaho
Power	County	Idaho
Teton	County	Idaho

Utah

Cache	County	Utah
Grand	County	Utah
Rich	County	Utah