

# LUKAS, NACE, GUTIERREZ & SACHS, LLP

8300 GREENSBORO DRIVE, SUITE 1200  
MCLEAN, VIRGINIA 22102  
703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS  
DAVID L. NACE  
THOMAS GUTIERREZ\*  
ELIZABETH R. SACHS\*  
DAVID A. LAFURIA  
PAMELA L. GIST  
TODD SLAMOWITZ\*  
TODD B. LANTOR\*  
STEVEN M. CHERNOFF\*  
KATHERINE PATSAS NEVITT\*

CONSULTING ENGINEERS  
ALI KUZEHKANANI  
LEILA REZANAVAZ  
OF COUNSEL  
GEORGE L. LYON, JR.  
LEONARD S. KOLSKY\*  
JOHN CIMKO\*  
J. K. HAGE III\*  
JOHN J. McAVOY\*  
HON. GERALD S. MCGOWAN\*  
TAMARA DAVIS BROWN\*  
JEFFREY A. MITCHELL  
ROBERT S. KOPPEL\*

\*NOT ADMITTED IN VA

January 18, 2012

## VIA ECFS

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  
Oklahoma 5, LLC  
Form 499 Filer ID No. 827486

Dear Mr. Barnett:

On behalf of Oklahoma 5, LLC 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 location technologies.

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

Very truly yours,



Todd Slamowitz

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**

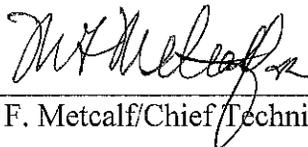
Carrier: Oklahoma 5, LLC  
Technology: Network-based  
Signing officer: Michael F. Metcalf  
Title: Chief Technical Officer  
Address: 1170 Devon Park Drive, Suite 104  
Wayne, PA 19087  
Telephone: (610) 535-6900

I, Michael F. Metcalf, am an officer of Oklahoma 5, LLC ("Oklahoma 5"). 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.

Oklahoma 5 uses network-based technologies to provide E911 Phase II location services. Attached hereto is its E911 Location Accuracy Exclusion Report, which includes a list of counties where Oklahoma 5 is utilizing the FCC Rule Section 20.18(h)(1)(vi) exclusion from the location accuracy standards for network-based technologies, because of insufficient quantity, density, and/or geometry of cell sites in those areas to support network-based triangulation.

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 January 18, 2012



---

Michael F. Metcalf/Chief Technical Officer

