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*NOT ADMITTED IN VA

January 18, 2012

VIA ECFS

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

Re: PS Docket No. 07-114
E911 Location Accuracy Exclusion Report
MTPCS, LLC

Dear Mr. Barnett:

On behalf of MTPC, 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

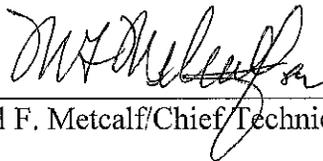
Carrier: MTPCS, LLC
Technology: Network-based
Signing officer: Michael F. Metcalf
Title: Chief Technical Officer
Address: 1170 Devon Park Drive, Suite 104
Wayne, PA 19087
Telephone: (610) 535-6900

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

MTPCS 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 MTPCS 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

E911 LOCATION ACCURACY EXCLUSION REPORT

Below is a list of counties and partial counties where MTPCS is excluding under FCC Rule Section 20.18(h)(1)(vi) from location accuracy standards for network-based technologies due to insufficient quantity, density, and/or geometry of cell sites. Further, all of the counties listed below are counties whereby MTPCS has received a valid Phase II request from the PSAP.

E911 Excluded Counties	E911 Excluded Counties
Beaverhead	Laurel
Big Horn	Lewis & Clark
Broadwater	Mineral
Carbon	Missoula
Cascade	Pondera
Chouteau	Powell
Custer	Ravalli
Deer Lodge	Rosebud
Fergus	Sanders
Flathead	Silver Bow
Gallatin	Stillwater
Glacier	Sweetgrass
Golden Valley	Teton
Granite	Toole
Hill	Treasure
Jefferson	West Yellowstone
Lake	Yellowstone