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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
Smith Bagley, Inc.
Form 499 Filer ID No. 806157

Dear Mr. Barnett:

On behalf of Smith Bagley, Inc. 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: Smith Bagley, Inc.
Technology: Network-based
Signing officer: Gayle Gouker
Title: Chief Financial Officer
Address: 1500 South White Mountain Road
Show Low, AZ 85901
Telephone: (928) 537-0690

I, Gayle Gouker, am an officer of Smith Bagley, Inc. ("SBI"). 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.

SBI 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 SBI 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



Gayle Gouker
Chief Financial Officer

E911 LOCATION ACCURACY EXCLUSION REPORT

Below is a list of counties and partial counties where SBI 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 to support network-based triangulation.

E911 Excluded Counties
McKinley, NM
San Juan, NM