



Squire Sanders (US) LLP
1200 19th Street, NW
Suite 300
Washington, D.C. 20036

O +1 202 626 6600
F +1 202 626 6780
squiresanders.com

Bruce A. Olcott
T +1 202 626 6615
bruce.olcott@squiresanders.com

June 21, 2013

BY ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Notification of Completion of Initial Buildout in 40 Economic Areas and
Establishment of Website and Toll-Free Help Desk**

Dear Ms. Dortch:

On June 6, 2013, the Commission issued an Order granting Progeny LMS, LLC (“Progeny”) authority to commence commercial operation using its Multilateration Location and Monitoring Service (“M-LMS”) licenses.¹ As a condition of the Order, the Commission directed Progeny to submit by June 21, 2013 notification of the specific Economic Areas (“EAs”) where Progeny has completed initial buildout of its network and is currently operating.² The Order also directed Progeny to establish a website and toll-free help desk to enable Part 15 device users to notify Progeny and seek assistance in investigating and mitigating potential interference in the 902-928 MHz band.³

Pursuant to the first requirement, please find attached a list of the 40 EAs in which Progeny has constructed and placed into operation a sufficient number of base stations that utilize multilateration technology to provide multilateration location service to at least one-third of the population on or before June 21, 2013.⁴ In the San Francisco EA, Progeny has additionally completed construction and placed into operation a sufficient number of base

¹ *Request by Progeny LMS, LLC for Waiver of Certain Multilateration Location and Monitoring Service Rules Progeny LMS, LCC, WT Docket No. 11-49, Demonstration of Compliance with Section 90.353(d) of the Commission’s Rules, Order, FCC 13-78 (2013) (“Order”).*

² *Id.*, ¶¶ 30, 34.

³ *Id.*

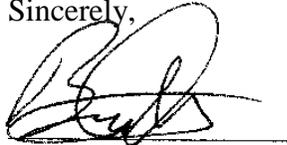
⁴ *Id.*, ¶ 30 (defining initial buildout requirement with reference to 47 C.F.R. § 90.155(d)).

stations that utilize multilateration technology to provide multilateration location service to at least two-third of the population prior to June 21, 2013. Progeny will continue to notify the Commission within 15 days as it completes initial buildout and begins operating in subsequent of its licensed EAs.

With respect to the second condition of the Order, Progeny has established an initial version of its website and toll-free help desk to assist Part 15 unlicensed device users. The website can be accessed using the www.Progenylms.com website address and will permit Part 15 device users to submit inquiries and seek assistance, which will be responded to by Progeny specialists. In addition, a toll-free help desk has been established using the toll-free number 1-855-716-5743. The help desk will initially be staffed during normal business hours, with voicemail capabilities outside normal business hours. Enhancements to both the website and the help desk will be developed based on the nature and amount of traffic that each service generates.

Please contact the undersigned if you have any questions regarding this notification.

Sincerely,



Bruce A. Olcott

Counsel to Progeny LMS, LLC

Attachment A
Top 40 EAs - Initial Buildout Complete

BEA003 WPQP849 Boston-Worcester-Lawrence, ME
BEA003 WPQP850 Boston-Worcester-Lawrence, ME
BEA006 WPQP855 Syracuse, NY-PA
BEA006 WPQP856 Syracuse, NY-PA
BEA010 WPQP863 New York-North New Jersey, NY-NJ
BEA010 WPQP864 New York-North New Jersey, NY-NJ
BEA012 WPQP867 Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD
BEA012 WPQP868 Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD
BEA013 WPQP869 Washington-Baltimore, DC-MD
BEA013 WPQP870 Washington-Baltimore, DC-MD
BEA018 WPQP875 Greensboro-Winston-Salem-High Point, NC-VA
BEA018 WPQP876 Greensboro-Winston-Salem-High Point, NC-VA
BEA019 WPQP877 Raleigh-Durham-Chapel Hill, NC
BEA019 WPQP878 Raleigh-Durham-Chapel Hill, NC
BEA029 WPQP895 Jacksonville, FL-GA
BEA029 WPQP896 Jacksonville, FL-GA
BEA023 WPQP883 Charlotte-Gastonia-Rock Hill, SC
BEA023 WPQP884 Charlotte-Gastonia-Rock Hill, SC
BEA030 WPQP897 Orlando, FL
BEA030 WPQP898 Orlando, FL
BEA031 WPQP899 Miami-Fort Lauderdale, FL
BEA031 WPQP900 Miami-Fort Lauderdale, FL
BEA034 WPQP905 Tampa-St. Petersburg-Clearwater, FL
BEA034 WPQP906 Tampa-St. Petersburg-Clearwater, FL
BEA040 WPQP911 Atlanta, GA-AL-NC
BEA040 WPQP912 Atlanta, GA-AL-NC
BEA049 WPQP925 Cincinnati-Hamilton, OH-KY-IN
BEA049 WPQP926 Cincinnati-Hamilton, OH-KY-IN
BEA051 WPQP929 Columbus, OH
BEA051 WPQP930 Columbus, OH
BEA053 WPQP931 Pittsburgh, PA-WV
BEA053 WPQP932 Pittsburgh, PA-WV
BEA055 WPQP935 Cleveland-Akron, OH-PA
BEA055 WPQP936 Cleveland-Akron, OH-PA
BEA057 WPQP939 Detroit-Ann Arbor-Flint, MI
BEA057 WPQP940 Detroit-Ann Arbor-Flint, MI
BEA062 WPQP943 Grand Rapids-Muskegon-Holland, MI
BEA062 WPQP944 Grand Rapids-Muskegon-Holland, MI
BEA063 WPQP945 Milwaukee-Racine, WI
BEA063 WPQP946 Milwaukee-Racine, WI
BEA064 WPQP947 Chicago-Gary-Kenosha, IL-IN-WI
BEA064 WPQP948 Chicago-Gary-Kenosha, IL-IN-WI
BEA067 WPQP953 Indianapolis, IN-IL
BEA067 WPQP954 Indianapolis, IN-IL
BEA071 WPQP961 Nashville, TN-KY
BEA071 WPQP962 Nashville, TN-KY
BEA073 WPQP963 Memphis, TN-AR-MS-KY

BEA073 WPQP964 Memphis, TN-AR-MS-KY
BEA083 WPQP977 New Orleans, LA-MS
BEA083 WPQP978 New Orleans, LA-MS
BEA096 WPQP991 St. Louis, MO-IL
BEA096 WPQP992 St. Louis, MO-IL
BEA099 WPQP993 Kansas City, MO-KS
BEA099 WPQP994 Kansas City, MO-KS
BEA125 WPQQ212 Oklahoma City, OK
BEA125 WPQQ213 Oklahoma City, OK
BEA127 WPQQ214 Dallas-Fort Worth, TX-AR-OK
BEA127 WPQQ215 Dallas-Fort Worth, TX-AR-OK
BEA131 WPQQ218 Houston-Galveston-Brazoria, TX
BEA131 WPQQ219 Houston-Galveston-Brazoria, TX
BEA134 WPQQ224 San Antonio, TX
BEA134 WPQQ225 San Antonio, TX
BEA141 WPQQ226 Denver-Boulder-Greeley, CO-KS-NE
BEA141 WPQQ227 Denver-Boulder-Greeley, CO-KS-NE
BEA152 WPQQ234 Salt Lake City-Ogden, UT-ID
BEA152 WPQQ235 Salt Lake City-Ogden, UT-ID
BEA153 WPQQ236 Las Vegas, NV-AZ-UT
BEA153 WPQQ237 Las Vegas, NV-AZ-UT
BEA158 WPQQ242 Phoenix-Mesa, AZ-NM
BEA158 WPQQ243 Phoenix-Mesa, AZ-NM
BEA160 WPQQ246 Los Angeles-Riverside-Orange County, CA-AZ
BEA160 WPQQ247 Los Angeles-Riverside-Orange County, CA-AZ
BEA161 WPQQ248 San Diego, CA
BEA161 WPQQ249 San Diego, CA
BEA163 WPQQ252 San Francisco-Oakland-San Jose, CA
BEA163 WPQQ253 San Francisco-Oakland-San Jose, CA
BEA167 WPQQ257 Portland-Salem, OR-WA
BEA167 WPQQ258 Portland-Salem, OR-WA
BEA170 WPQQ261 Seattle-Tacoma-Bremerton, WA
BEA170 WPQQ262 Seattle-Tacoma-Bremerton, WA