

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Wireless E911 Location Accuracy) PS Docket No. 07-114
Requirements)
)
)

To: The Commission

**EXCLUSION REPORT
PLATEAU TELECOMMUNICATIONS, INC. D/B/A PLATEAU**

Plateau Telecommunications, Inc. d/b/a Plateau (“Plateau”), by its counsel, and pursuant to section 20.18(h)(1)(vi) of the Rules and Regulations of the Federal Communications Commission (“FCC” or “Commission”),¹ the Second Report and Order², and the Order released June 28, 2011 in the above-referenced docket,³ hereby updates the list of counties excluded from compliance with the network-based E911 Phase II location accuracy standards.⁴ Plateau is a tier III mobile wireless carrier providing service in rural eastern New Mexico and west Texas. Plateau utilizes a network-based solution to implement Phase II E911.

¹ 47 C.F.R. § 20.18(h)(1)(vi).

² *In re Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, Second Report and Order, 25 FCC Rcd 18909 (2010).

³ *In re Wireless E911 Location Accuracy Requirements*, Order, DA 11-1125 (2011) (“*Exclusion Report Order*”).

⁴ Copies of this Exclusion Report are being sent via email to the National Emergency Number Association, the Association of Public-Safety Communications Officials-International, and the National Association of State 9–1–1 Administrators pursuant to the *Exclusion Report Order* and rule 20.18(h)(1)(vi).

Appendix A, attached hereto, identifies the county in which triangulation is not technically possible.

Respectfully submitted

**PLATEAU TELECOMMUNICATIONS, INC.
D/B/A PLATEAU**

By:

A handwritten signature in black ink, appearing to read 'G. Whiteaker', with a long horizontal flourish extending to the right.

Gregory W. Whiteaker
Herman & Whiteaker, LLC
3204 Tower Oaks Boulevard, Suite 180
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202-600-7274
Its attorneys

Dated: August 15, 2013

Appendix A
Plateau Telecommunications, Inc. d/b/a Plateau

<u>Exclusion Areas</u>	<u>Reason for Exclusion</u>
Mora County, New Mexico	Insufficient number of cell sites in the area to support network-based triangulation, given heavy forestation and terrain obstructions in the area.

DECLARATION OF TOM M. PHELPS

I, Tom M. Phelps, do hereby declare under penalty of perjury the following:

1. I am the Chief Executive Officer of Plateau Telecommunications, Inc., d/b/a Plateau (“Plateau”), 7111 North Prince Street, Clovis, New Mexico 88101, (575) 389-4220.
2. I am the officer having chief oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) of the FCC’s Rules.
3. I have read the foregoing “Exclusion Report” of Plateau dated August 15, 2013. I have personal knowledge of the facts set forth therein, and I believe them to be true and correct.



Tom M. Phelps

Dated: August 15, 2013