



August 2, 2022

VIA EMAIL: Jessica.Rosenworcel@fcc.gov

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Dear Chairwoman Rosenworcel:

Thank you for your July 19, 2022 letter inquiry regarding subscriber geolocation data. I appreciate your attention to this issue and agree with you that the manner in which such information is collected, stored and used can have important public safety and privacy implications.

H2O Wireless operates as a mobile virtual network operator. As such, H2O Wireless does not collect, store, use or share any geolocation data which we understand to mean real-time location information or other form of information regarding a consumer's precise physical location when using our services.

While H2O does not collect geolocation data, we note that certain information the company receives in call detail records (CDRs) from our underlying provider includes some broader geographic information about a consumer's location when using our services. We do not view this information as geolocation information because it does not provide information as to a subscriber's precise physical location. We do not disclose any CDR information except under legal or regulatory compulsion.

I hope that you find this letter, albeit brief, to be fully responsive to yours. Should you have any questions about our response, please feel free to reach out to me directly.

Sincerely,

A handwritten signature in black ink that reads "Jack Woo". The signature is written in a cursive, flowing style.

Jack Woo
President, Locus Telecommunications,
a division of Telrite Holdings