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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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December 7, 1998

**Via Hand Delivery**

**Ms. Magalie R. Salas**

**Secretary**

**Federal Communications Commission**

**1919 M Street, N.W., Room 222**

**Washington, DC 20554**

\* UT BAR ONLY  
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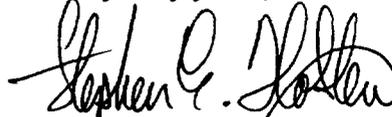
**Re: In the Matter of Revision of the Commission's Rules to Ensure  
Compatibility with Enhanced 911 Emergency Calling Systems  
Request of D&E Wireless, Inc. for Waiver of Section 20.18(c)  
of the Commission's Rules  
CC Docket No. 94-102  
RM-8143**

**Dear Ms. Salas:**

Please associate the enclosed original executed Declaration of Robert L. Quaranta with the Request for Rule Waiver filed by D&E Wireless, Inc. on December 4, 1998 in the above-referenced matter. A facsimile copy of this declaration was submitted with the filing. In addition, please substitute the enclosed page, which properly sets forth the title, "REQUEST FOR RULE WAIVER," for the first page of the December 4 filing.

Kindly direct any questions or correspondence regarding this matter to the undersigned.

Very truly yours,



Stephen E. Holsten  
Counsel to D&E Wireless, Inc.

Enclosures

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**DECLARATION OF ROBERT L. QUARANTA**

I, Robert L. Quaranta, do hereby declare under penalty of perjury that the following is true, complete and correct:

- 1. I am the Chief Executive Officer of D&E Wireless, Inc. ("D&EW").
- 2. I am responsible for the regulatory affairs of D&EW.
- 3. I have read and am familiar with the foregoing Request for Rule Waiver. The facts contained therein are true, complete and correct to the best of my knowledge, information and belief.

  
 Robert L. Quaranta

Date: December 4, 1998

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket No. 94-102
To Ensure Compatibility with	)	RM-8143
Enhanced 911 Emergency	)	
Calling Systems	)	
	)	
Request for Waiver of	)	
Section 20.18(c) of the	)	
Commission's Rules	)	

To: The Wireless Telecommunications Bureau

**REQUEST FOR RULE WAIVER**

D&E Wireless, Inc. ("D&EW"), on behalf of its broadband PCS licensee subsidiary<sup>1</sup> and pursuant to Section 1.3 of the Commission's rules, files this request for a waiver of Section 20.18(c) of the Commission's Rules, consistent with the Bureau's November 13, 1998 Order<sup>2</sup> in the above-captioned proceeding. D&EW anticipates that it will not be possible to enable use of TTY devices over D&EW's digital wireless systems by the implementation deadline of December 31, 1998. As described more fully below, D&EW intends to continue to work diligently to deploy/upgrade its systems to enable use of TTY devices, D&EW has established a timetable for

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<sup>1</sup>D&EW's wholly-owned subsidiary, PCS Licenses, Inc., currently holds the PCS Block E license for the York-Hanover, PA Basic Trading Area ("BTA"), call sign KNLG721, and the PCS Block D license for the Harrisburg, PA BTA, call sign KNL911. Both licenses are subject to a pending application for Commission consent to the assignment of the licenses from PCS Licenses, Inc. to D&E/Omnipoint Wireless Joint Venture, L.P., file number 50532-CW-AL-98.

<sup>2</sup>Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Order*, DA 98-2323 (Wir. Tel. Bur. Nov. 13, 1998) ("Order"), ¶¶ 10-12 (discussing procedures and guidance for carriers that seek a waiver of the TTY requirements of the Commission's wireless E911 obligations, 47 C.F.R. § 20.18(c)).