

EC Docket 94-102

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November 2, 2000

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: **Tritel Communications, Inc.**
E-911 Phase 2 Implementation Plan

Dear Ms. Salas:

On behalf of Tritel Communications, Inc. ("Tritel") and pursuant to Section 20.18(i) of the Commission's Rules, enclosed is a narrative statement regarding Tritel's E-911 Phase 2 implementation plans.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

B. Lynn F. Ratnavale

c: International Transcription Service (w/ enc. on diskette)
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Background/Contact Information**(1) Carrier Identifying Information**

Tritel Communications, Inc.
d.b.a. SunCom
TRS # 819896

(2) Contact Information

John Garner
Manager, Regulatory Compliance
Tritel Communications, Inc.
111 East Capitol Street, Suite 500
Jackson, MS 39201
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E911 Phase II Location Technology Information**(1) Type of Technology**

Tritel Communications, Inc. believes that a network-based technology is the only option available as of the date of this filing. Most major handset manufacturers have notified the Commission that they will not produce location capable handsets in time to meet the Commission's requirements. Tritel Communications, Inc. is unaware of any technology which has been proven in independent, scientifically valid trials to meet the Commission's requirements.

Tritel Communications, Inc. will likely utilize a combination of TDOA (Time Difference of Arrival) and AOA (Angle of Arrival) technology position determining equipment.

TDOA uses multiple receivers, located at cell sites, with highly accurate timing sources. It requires a minimum of three receivers to locate a caller. The mobile unit's signal is received at the cell sites and time stamped. The difference in the time received is used to calculate intersecting hyperbolic lines. The intersection of these lines is an estimation of the caller's location.

AOA utilizes an array of specialized antennas located at cell sites. The array determines the angle at which the mobile unit's signal arrives at each element of an array. The intersection of the angle at which the signal arrives at multiple cell sites is used to estimate the location of the caller.

Tritel Communications, Inc. will likely use the same technology throughout its service territory.

In addition to Position Determining Equipment (PDE), all technologies require a location management system to interface between the PDE and the mobile switching center and the wireline network E911 system. It is possible that modifications to Tritel Communications Inc.'s mobile switching centers and network may be required. It is also anticipated at modifications to the wireline E911 network will be required as well. Tritel Communications, Inc. is unaware of the nature the nature of any such required modifications.

Tritel Communications, Inc. has not chosen a vendor or vendors for either PDE or location management as of the date of this filing. Tritel Communications, Inc. is unaware as to the whether the wireline E911 network is capable of supporting Phase II E911 service in the areas in which it has been requested. Information has been requested from the appropriate local exchange carrier as to the nature and extent of any modifications required and the schedule for their implementation.

(2) Testing and Verification

Tritel Communications, Inc. has not conducted any tests of Phase II technology. Tritel Communications, Inc. will adopt testing and verification methods and procedures based on sound engineering and statistical practices. This testing and verification will likely be incorporated into routine testing of the wireless network by company technicians.

(3) Implementation Details and Schedule

Tritel Communications, Inc.'s strategy will be to purchase the required equipment (hardware and software) and services on the competitive market and deploy the same in accordance with the Commission's rules. Tritel Communications will notify the FCC of a specific schedule for implementation once a vendor has been chosen. Tritel Communications recognizes that the Commission's rules require the deployment of a Phase II system, even if none exists which fully meet the Commission's accuracy requirements.

(4) PSAP Interface

We will incorporate any required industry standards. We will transmit the data through the public switched telephone network to the PSAP following industry standards adopted by the service supplier providing E911 service to the PSAP.

(5) Existing Handsets

Tritel Communications, Inc. will deploy a network based technology. This section is therefore not applicable.

(6) Location of Non-Compatible Handsets

Tritel Communications, Inc. will deploy a network based technology. This section is therefore not applicable.

(7) Other Information

We have received one apparently valid request for Phase II service. This request was dated 06/21/2000 and was received from:

Mobile County Emergency Communications District
7340 Zeigler Boulevard
Mobile, Alabama 36608