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FEDERAL COMMUNICATIONS COMMISSION
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November 9, 2000

ORIGINAL

Magalie Roman Salas, Secretary
Federal Communications Commission
445-12th St. TW-A235
Washington, DC 20554

Re: Litchfield County Cellular Inc., d/b/a Ramcell of Oregon 's Report on E911
Phase II Implementation

Dear Ms. Salas:

Pursuant to Section 20.18(i) of the FCC's rules, 47 C.F.R. 20.18(i), Litchfield County Cellular Inc., d/b/a Ramcell of Oregon, ("OR5"), hereby reports its plans for implementing Phase II enhanced 911 ("E911") service.

Please do not hesitate to contact the undersigned with any questions you may have at (202)783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By: William J. Sill
Laura A. Schink

Enclosures

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Before the
Federal Communications Commission
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In the Matter of)
)
Revision of the Commission's Rules to Ensure) CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)
Calling Systems)
)
Phase II Implementation Report) TRS No. 806506

To: The Commission

REPORT ON ENHANCED 911 PHASE II IMPLEMENTATION

Pursuant to Section 20.18(i) of the FCC's rules, 47 C.F.R. 20.18(i), Litchfield County Cellular Inc., d/b/a Ramcell of Oregon ("OR5"), hereby reports its plans for implementing Phase II enhanced 911 ("E911") service. This report is responsive to the requirements set forth in the FCC's rules and is organized in accordance with the Wireless Telecommunications Bureau's guidance.^{1/}

I. BACKGROUND/CONTACT INFORMATION

A. Licensee Name

Litchfield County Cellular Inc., d/b/a Ramcell of Oregon

B. Contact Information

Correspondence or other inquiries regarding this report should be addressed to:

Jeff Ramsey
1185 Russ Avenue
Waynesville, North Carolina 28786
(828) 452-5757

^{1/} Public Notice, *Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification*, CC Docket No. 94-102, DA 00-2099 (rel. Sept. 14, 2000).

II. E911 PHASE II LOCATION TECHNOLOGY INFORMATION

A. Type of Technology

Based upon current technology and vendor representations received in response to multiple requests for information and requests for proposals OR5 currently intends to test and implement a handset-based automatic location information (“ALI”) technology throughout its service territory. However, OR5 will also continue to explore its options to utilize a network-based solution. OR5 reserves the right to change its plan and select an alternative ALI technology, as permitted under the Commission’s rules.^{2/}

B. Testing and Verification

Currently, OR5 is considering multiple vendors and reviewing the technology that is available from them. As the E911 Phase II technology and equipment has not been concretized, OR5 cannot make a final determination as to what technology and equipment it will use. Thus, OR5 cannot finalize its verification plans. However, OR5 intends to verify the performance and operation of any installed ALI solution during installation and commissioning of the technology into the existing network. OR5 intends to seek vendor participation in the planning and verification testing stages. As soon as OR5 reaches a decision and selects its vendor, it will work closely with them to obtain greater detail on planning and verification stages.

^{2/} See *Third Report and Order*, 14 FCC Rcd. 17388, ¶ 89 (1999).

C. Implementation Details and Schedule

OR5 is currently working within the following timeframe for implementation of an ALI handset-based solution that will comply with the FCC's E911 Phase II directives:

1st Quarter 2001 – Technology evaluation and vendor negotiations for ALI compliant handsets

2nd Quarter 2001 – Technology selection and vendor selection. Equipment orders placed.

3rd Quarter 2001 – ALI installation and commissioning. Verification trials.

4th Quarter 2001 – Compliance with E911 Phase II ALI handset requirements.

It must be noted that OR5's timeline is dependant on several external factors, which may impact the success or achievements made. For example, the co-operation and readiness of the local PSAP and the availability date of E911 Phase II compliant equipment will either assure that the deadline is made or missed.

D. PSAP Interface

OR5 will work closely with the PSAPs in its reliable service area to coordinate the implementation, and provide Phase II E911. OR5 intends to implement an ALI solution for its network that will comply with the Telecommunications Industry Association (TIA) issued interim standard, TIA J-STD-036, Enhanced Wireless 9-1-1 Phase II. The current issue was released in June 2000.

OR5 will be seeking vendor compliance with this standard for the PSAP interfaces. This standard specifically addresses the requirements of carriers to report position information to emergency services systems, as mandated by the FCC.

E. Existing Handsets

OR5 has no immediate plans to implement a handset retrofit program to replace existing customer owned non-ALI handsets with ALI compatible handsets. Rather, existing customers will be able to purchase ALI compliant handsets for use with their existing active account. However, to the extent that handset retrofitting is economical and available OR5 considers it to be an option.

F. Location of Non-Compatible Handsets

OR5 will use its best efforts to provide location cell site information utilizing Phase I technology. OR5 will continue to review any vendor's plan for providing ALI information compatibility for ALI non-compatible handsets but at this time has no plans to implement a technology solution for non-compatible handsets. OR5 believes that by the time the land line networks and the designated PSAP's facilities have been upgraded, the number of non-compatible handsets will be significantly reduced by the introduction of compatible handsets into the marketplace.

G. Other Information

OR5 notes that PSAPs must be "capable of receiving and utilizing the data elements associated with the service," and have a cost recovery mechanism in place before OR5 is obligated to deploy Phase II service in a market.^{3/} To date, OR5 has not received any E911 Phase II requests from PSAPs. Nor does it anticipate receiving any in the near future.

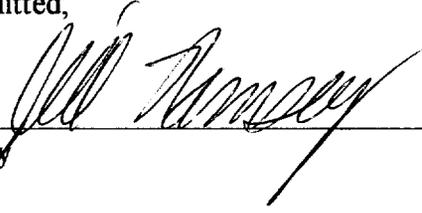
^{3/} 47 C.F.R. § 20.18(j).

III. CONCLUSION

As discussed herein, the instant report is submitted pursuant to the requirements set forth in Section 20.18(i) of the FCC's rules. In the event that additional information is requested, OR5 will consult with FCC staff to discuss appropriate means of ensuring that business proprietary information, is not publicly disclosed.

Respectfully submitted,

By:



Jill Ramsey
Treasurer

November 8, 2000