

DOCKET FILE COPY ORIGINAL

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037-1128
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com

ORIGINAL

RECEIVED

NOV 9 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 9, 2000

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

Re: *Eastern Sub-RSA Limited Partnership'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), Eastern Sub-RSA Limited Partnership, ("ESRLP"), 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

No. of Copies rec'd 014
List ABCDE

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

RECEIVED

NOV 9 2000

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

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: 801741

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), Eastern Sub-RSA Limited Partnership ("ESRLP"), 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.¹⁷

I. BACKGROUND/CONTACT INFORMATION

A. Licensee Name

Eastern Sub-RSA Limited Partnership

¹⁷ 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).

B. Contact Information

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

Gregory A. Maras
Secretary/Director of Engineering
P.O. Box 688
Roslyn, WA 98941
Phone: (509) 649-2500
Fax: (509) 649-3300
Email: gmaras@inlandnet.com

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 ESRLP currently intends to test and implement a handset-based automatic location information (“ALI”) technology throughout its service territory. ESRLP 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

As the E911 Phase II technology and equipment has not been concretized, ESRLP cannot make a final determination as to what technology and equipment it will use. Thus, ESRLP cannot finalize its verification plans. However, ESRLP intends to verify the performance and operation of any installed ALI solution during installation and commissioning of the technology into the existing network. ESRLP intends to seek vendor participation in the planning and verification testing stages. ESRLP has tentatively concluded that it will be utilizing Nortel as its vendor and is working with Nortel to obtain greater detail on planning and verification stages. Accordingly, on October 16, 2000, ESRLP sent a letter to Nortel requesting information

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

regarding the availability of E911 ALI technology. Unfortunately, to date, ESRLP has not received a response from Nortel. A copy of ESRLP's letter to Nortel is provided as *Attachment I*.

I.

C. Implementation Details and Schedule

ESRLP 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 ESRLP's timeline is dependent 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

ESRLP has contacted all of the PSAPs within Washington State^{3/} to discuss Phase II implementation and will be working with these PSAPs to provide Phase II E911. A copy of the letter that was sent to all the PSAPs, as well as the one response ESRLP received, are provided as *Attachment II*. ESRLP intends to implement an ALI solution for its network that will comply with the Telecommunications Industry Association (TIA) issued interim standard, TIA J-STD-

^{3/} Letters requesting information were sent on October 16, 2000 to the PSAPs of the following counties in Washington State: Grant, Lincoln, and Adams. To date, only the PSAP from Grant County has responded to WA5's letter.

036, Enhanced Wireless 9-1-1 Phase II. The current issue was released in June 2000.

ESRLP 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

ESRLP 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 ESRLP considers it to be an option.

F. Location of Non-Compatible Handsets

ESRLP will use its best efforts to provide location cell site information utilizing Phase I technology. ESRLP 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. Based upon responses from PSAPs to date, ESRLP 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

To date, ESRLP has not received any E911 Phase II requests from PSAPs. Presently Phase I discussions are taking place between PSAPs and carriers in Washington State regarding the terms and conditions under which Phase I will be provided.

ESRLP 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 ESRLP is obligated to deploy Phase II service in a market.^{4/} At this point none of the PSAPs in ESRLP’s reliable coverage areas have independently contacted ESRLP, and only one PSAP has responded to ESRLP’s letter. The sole PSAP that did respond candidly acknowledged that it has not started any implementation of Phase I or Phase II, it is uncertain when funds will be allocated to begin planning such implementation, and it does not know when a Phase II request will be made (*See Attachment II*).

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, ESRLP will consult with FCC staff to discuss appropriate means of ensuring that business proprietary information, is not publicly disclosed.

Respectfully submitted,

By: 
Gregory A. Maras
Secretary

November 8, 2000

^{4/} 47 C.F.R. § 20.18(j).

ATTACHMENT I

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300



October 16, 2000

Mr. Jim Torbert
Nortel Networks
5405 Windword Parkway
MS 46D-03-C60
Alpharetta, GA 30004

Re: E911 Phase II Reporting Requirements

Dear Mr. Torbert:

Inland Cellular Telephone Company ("Inland") as general partner of Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership is currently preparing the information required by the Federal Communications Commission ("FCC") in the upcoming Enhanced 911 ("E911") Phase II Carrier Report ("Report"). Under the E911 rules, cellular and other CMRS carriers are required to report their Phase II implementation and deployment plans to the FCC *not later than November 9, 2000*. However, Inland's ability to comply with the FCC's deadline is being hampered by our inability to obtain information from Nortel Networks ("Nortel"). I have previously made several requests of Nortel for the information, but none has been forthcoming. Without an account manager, Inland is not receiving the support that it needs or deserves.

The information which must be provided in the report includes basic information concerning the carrier's Phase II plans, including but not limited to the technology the carrier plans to employ (*i.e.*, network-based, handset-based or hybrid), whether this technology requires replacement or upgrades of any wireless handsets, and how the carrier plans to verify compliance with the Phase II accuracy requirements. More detailed information which must be provided includes the strategy and schedule for the roll-out of the ALI technology, and hardware and software changes needed to transmit Phase II data to PSAPs. For your reference I have attached a copy of the FCC's Public Notice which sets forth the reporting requirements.

As our sole cellular network equipment vendor, Nortel has at its disposal the very information that we must have in order to file the E911 Phase II Report. In general, please provide information concerning the equipment and software we will have to add to our network to support E911 Phase II as well as information concerning the anticipated date upon which Phase II compliant GPS handsets will be commercially available. We also request that you provide information concerning each of the points enumerated in the Public Notice.

October 12, 2000

Page 2

If the Partnerships fail to file their E911 Phase II Reports by November 9, 2000, they face the specter of FCC sanctions. We cannot make the filing without Nortel's information. Thus, we must insist that you provide Inland with the requested information by no later than October 23, 2000. Inland is disappointed in Nortel's response to our previous requests for CALEA and E911 Phase II information. While Inland is pleased with Nortel's equipment, a strong business relationship can only be forged if Inland is properly supported by Nortel.

Please send the requested information directly to me at the above address or via e-mail at gmaras@Inlandnet.com or telecopy it to (509) 649-3300.

Sincerely,

Gregory A. Maras / bf

Gregory A. Maras

Secretary

Inland Cellular Telephone Company,

General Partner of Washington RSA No. 8

Limited Partnership and Eastern

Sub-RSA Limited Partnership

ATTACHMENT II



MULTI AGENCY COMMUNICATIONS CENTER

E9-1-1

6500 32nd Ave. NE Suite 911
Moses Lake, Washington 98837
Office (509) 762-1901 Fax (509) 762-1801

Sharon Seieroe
Director
E9-1-1 Coordinator

Board of Directors:

Representatives From:

Association of
Grant County
Cities and Towns

Grant County
Commissioners

Grant County
Emergency Medical
Council

Grant County
Fire Chiefs and
Commissioners

Grant County
Police Chiefs

Grant County
Sheriff

October 24, 2000

Gregory A. Maras, Secretary
Inland Cellular Telephone Company
103 S. 2nd Street
P.O. Box 688
Roslyn, WA 98941

RE: Impending FCC E911 Phase II Reporting Requirements

Dear Mr. Maras:

In reference to your letter of October 16, 2000, we offer the following answers to your questions.

*When have you budgeted the acquisition and buildout of your Phase II capability? *We have not started any implementation of Phase I or II.*

*Have you discussed equipment and software availability with vendors? *No.*

*Will this require the approval of additional monies from the State Legislature or a local government body? *Yes. If so, in what fiscal year will those funds be requested? We are not sure.*

*When do you have scheduled that the PSAP will be Phase II compliant? *We have no schedule as of yet.*

*When are you planning to request Phase II Service from Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership d/b/a Inland Cellular. *We have no requests planned at this time.*

Sincerely,

Sharon Seieroe
Director

SS:sjc
cc

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300

October 16, 2000



Mr. Roger Trump
Columbia County E911 Coordinator
P.O. Box 5
Dayton, WA 99328

Re: E911 Phase II Reporting Requirements

Dear Mr. Trump:

Inland Cellular Telephone Company ("Inland") as general partner of Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership is currently preparing the information required by the Federal Communications Commission ("FCC") in the upcoming Enhanced 911 ("E911") Phase II Carrier Report ("Report"). Under the E911 rules, cellular and other CMRS carriers are required to report their Phase II implementation and deployment plans to the FCC *not later than November 9, 2000*. The capabilities of the PSAP are an integral aspect of Inland's deployment schedule and thus your input is essential if we are to provide a full and accurate report to the FCC.

Designated PSAPs ("PSAP") play a pivotal role in the provision of Phase II E911 services to the public. If a carrier modified its system to provide Phase II information to the PSAP and the PSAP is unable to process the information, the public will not have E911 Phase II service. We note that currently, Inland has received a request for Phase I E911 service and that Inland and other carriers are working with King County to determine whether a mutually agreeable Phase I Carrier-PSAP Agreement can be developed.

So that we can provide the FCC with meaningful information concerning the scheduling of our buildout and operation of Phase II E911, we need the following information:

- * When have you budgeted the acquisition and buildout of your Phase II capability?
- * Have you discussed equipment and software availability with vendors?
- * Will this require the approval of additional monies from the State Legislature or a local governmental body? If so, in what fiscal year will those funds be requested?
- * When do you have scheduled that the PSAP will be Phase II compliant?

October 16, 2000

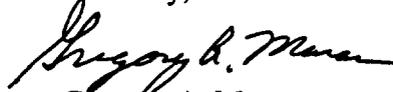
Page 2

- * When are you planning to request Phase II Service from Washington RSA No. 8 Limited Partnership and Eastern Sub-RSA Limited Partnership d/b/a Inland Cellular.

The receipt of this information is crucial to Inland's ability to provide a meaningful Report to the Commission. Please provide answers to the above questions no later than *October 23, 2000*, so that we will have sufficient time to factor in your information and provide the FCC with a thorough Report by November 9, 2000. You may reach me at the above address, via e-mail at gmaras@inlandnet.com or by telecopier at (509) 649-3300.

We appreciate your assistance in providing this important information.

Sincerely,



Gregory A. Maras

Secretary

Inland Cellular Telephone Company,

General Partner of Washington RSA No. 8

Limited Partnership and Eastern

Sub-RSA Limited Partnership