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January 3, 2001

ARTHUR BLOOSTON  
1914 - 1999

RECEIVED

WRITER'S CONTACT INFORMATION

(202) 828-5515  
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JAN - 3 2001

Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 - 12th Street, SW  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

94-1021

Attn: **Ms. Wendy Austrie**  
**Room 4-A425**  
**Wireless Telecommunications Bureau**

Re: **CC Communications**  
**(formerly named Churchill County Telephone**  
**& Telegraph System d/b/a C.C. Cellular),**  
**Licensee of CRS Station KNKN223,**  
**Implementation Plan of Wireless E-911 Phase II**  
**Automatic Location Identification**  
**Notice Pertaining to CC Docket No. 94-102 /**

Dear Ms. Salas:

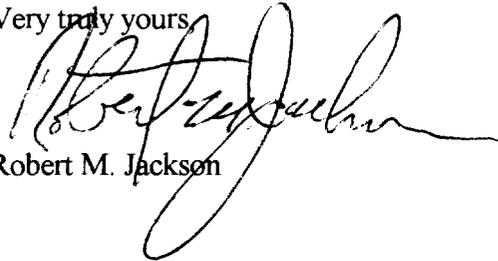
On behalf of CC Communications (formerly named Churchill County Telephone & Telegraph System d/b/a C.C. Cellular), we hereby respond to the Commission's December 27, 2000 letter which mistakenly asserts that the required E-911 implementation report has not been filed.

The Commission's December 27, 2000 letter asserts that a report was not filed by "Churchill County Telephone & Telegraph System d/b/a C.C. Cellular" ("Churchill County"). In point of fact, Churchill County, in a pro forma name change, changed its name to CC Communications in mid-2000. The pro forma name change was reported to the Commission in an administrative update filed July 7, 2000 under ULS File No. 0000183005 for Cellular Radiotelephone Service Station KNKN223.

CC Communications filed the required E-911 report with the Commission on November 9, 2000, a copy of which is attached for ease of reference.

Please refer any inquiries or correspondence in connection with this matter to our offices.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert M. Jackson", written in a cursive style. The signature is positioned above the printed name "Robert M. Jackson".

Robert M. Jackson

Attachment  
cc(w/att): Donald A. Mello

CC COMMUNICATIONS  
50 West Williams Avenue  
Fallon, Nevada 89406

RECEIVED RECEIPT

Magalie Roman Salas, Secretary  
Office of the Secretary  
445 - 12th Street, S.W.  
Washington, D.C. 20554

NOV 9 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Attention: Patrick Forster, Senior Engineer  
Room 3-A104  
Policy Division  
Wireless Telecommunications Bureau**

**Re: Implementation Plan of Wireless E-911 Phase II  
Automatic Location Identification  
Notice Pertaining to CC Docket No. 94-102**

**E-911 PHASE II STATUS REPORT**

Dear Ms. Salas:

In accordance with the Third Report and Order in CC Docket No. 94-102 and the Commission's related Public Notice, Mimeo DA 00-2099, released September 14, 2000, we hereby submit our report on the status of implementation plans for Wireless E-911 Phase II Automatic Location Information ("ALI"), as follows:

**Background/Contact Information**

1) Carrier Identifying Information:

CC Communications  
(formerly named Churchill County  
Telephone and Telegraph System)  
TRS Number: 808143

2) Contact Information: Donald A. Mello, General Manager  
CC Communications  
50 West Williams Avenue  
Fallon, Nevada 89406  
Tel: 775-423-7171  
FAX: 775-423-2326

and

Robert M. Jackson  
Blooston, Mordkofsky, Jackson & Dickens  
2120 L Street, N.W., Suite 300  
Washington, D.C. 20037  
Tel: 202-828-5515  
FAX: 202-828-5568  
E-Mail: rmj@bmjd.com

### **E-911 Phase II Location Technology Information**

1) Type of Technology: We are the licensee of a Frequency Block B cellular system serving the Nevada 1 - Humboldt RSA. Switching functions for our system are performed by Verizon's Sacramento, California MSA ("the Sacramento MSA") Motorola EMX 2500 cellular switch. We are a government-owned entity which is owned by the government of Churchill County, Nevada.

For our E-911 Phase II deployment, we presently intend to utilize the same ALI technology (be it handset-based or network-based) and the same brand of ALI equipment as deployed by Verizon for its Sacramento MSA system. As we understand it, Verizon presently intends to deploy a handset-based solution provided by XY Point Corporation of Seattle, Washington.

We may discontinue our switching arrangement with Verizon, and install our own switch, within the next year; but no assurance can be given at this time that we will be able to do so. Because we are only now beginning to explore the purchase and installation of our own switch, no assurance can be given that it will be a Motorola switch or that the switch ultimately selected will be compatible with the XY Point Corporation equipment. If we install our own switch and it is not compatible with the XY Point Corporation equipment, we will most likely deploy a combination of network-based and handset-based ALI solutions.

2) Testing and Verification: We anticipate using the same testing methodology employed by Verizon for the deployment of Phase II ALI capability in its Sacramento MSA cellular system. In the event we install our own switch, we will employ testing and verification procedures recommended by the equipment vendor and comply with the testing and verification guidelines set forth in the Commission's OET Bulletin No. 71. We intend to purchase ALI equipment on a "turn-key" basis, with testing and verification to be performed by the equipment vendor prior to our acceptance of the system.

Since there is very little information available from the ALI equipment vendors, it is difficult to determine at present

precisely what this testing methodology will entail. However, we would anticipate regular testing of random locations throughout our service area, beginning in areas where the PSAP has requested Phase II deployment.

3) Implementation Details and Schedule: We plan to adhere to the implementation schedule established by the Commission in the Fourth Memorandum Opinion and Order, released September 8, 2000. However, our ability to do so will depend, in large measure, on the ability of equipment manufacturers to have their products operational and delivered in a timely manner. It is anticipated that the equipment installation will be performed by the equipment vendor under a "turn-key" contract.

4) PSAP Interface: At present, we anticipate employing the same PSAP interface technology to be employed by Verizon in the operation of its Sacramento MSA cellular system.

There are three PSAPs in our service area, all operated by County Sheriffs Departments. In our opinion, the PSAPs will need to apply for financial assistance to deploy ALI, which, as we understand it, they have not done.

We have considerable experience in PSAP equipment and technology. Being government owned, we will continue to provide financial and technical support to the PSAP located in Churchill County. Their current PSAP equipment was purchased and installed, and is maintained, by us. At present, we provide a link from the PSAP to our subscriber records server for data dips to retrieve name and address information on the landline telephone operations side of our business. We anticipate that the same level of support will be provided for wireless ALI technology.

5) Existing Handsets: We will continue to keep abreast of our current handset suppliers' ALI deployment plans. Our subscribers will be informed beginning sometime in 2001, by way of bill inserts, of the coming availability of ALI-capable handsets and given the opportunity to acquire them, when available. Subscribers will also be informed of the December 31, 2005 date by which basically all or substantially all handsets must be ALI-capable.

6) Location of Non-Compatible Handsets: We will provide, at a minimum, Phase I ALI information for handsets that are incompatible with the Phase II technology if the local PSAP has Phase I capability and has requested the delivery of Phase I information.

Beginning with the October 1, 2001 date for starting to sell and activate ALI-capable handsets, we will tout their advantages to new subscribers and recommend that non-compatible handsets be restricted for use at campus locations. We will use a "best practices" solution in connection with providing ALI to non-

compatible handsets, assuming, of course, that the PSAP is equipped to utilize Phase II data. It appears that such solutions are currently in development and, at this stage, we are not committed to any particular solution.

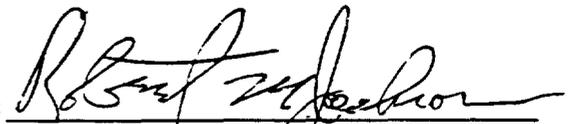
7) Other Information: To date, we have received no Phase I or Phase II E-911 ALI requests from the PSAPs.

Respectfully submitted

**CC Communications**

Dated: November 9, 2000

By:

  
Robert M. Jackson  
Its Attorney

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SARAH LEEPER \*

ARTHUR BLOOSTON  
1914 - 1999

\* ADMITTED ONLY IN CALIFORNIA  
SUPERVISION BY JOHN PRENDERGAST.  
A MEMBER OF THE DC BAR

November 9, 2000

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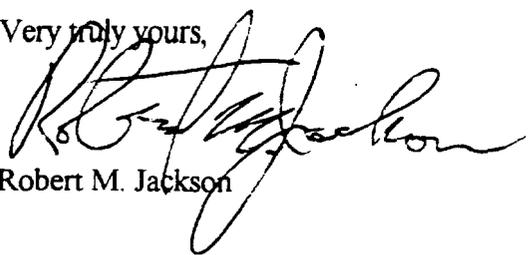
**Re: CC Communications,  
Implementation Plan of Wireless E-911 Phase II  
Automatic Location Identification  
Notice Pertaining to CC Docket No. 94-102**

Dear Ms. Salas:

On behalf of CC Communications, we are transmitting herewith its Report on Implementation of Wireless E-911 Phase II Automatic Location Identification.

Please refer any inquiries or correspondence in connection with this matter to our offices.

Very truly yours,

  
Robert M. Jackson

Attachment  
cc(w/att): Donald A. Mello