

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
The Use of N11 Codes and Other ) CC Docket No. 92-105  
Abbreviated Dialing Arrangements )  
 )

To: The Federal Communications Commission

**Jeopardy Report of Missouri RSA #5 Partnership  
Regarding Wireless 711 Access to TRS**

Missouri RSA # 5 Partnership d/b/a Chariton Valley Wireless Services (“Chariton Valley”), by its attorneys, hereby submits a jeopardy report regarding implementation of wireless 711 access to telecommunications relay services (“TRS”), in compliance with the Federal Communications Commission’s (“FCC” or “Commission”) *Second Report and Order* in the above-captioned proceeding.<sup>1</sup> For the reasons discussed below, Chariton Valley may not be able to resolve the implementation issues in order to provide 711 access to TRS or adequately meet its education obligations by October 1, 2001, in accordance with Sections 64.603 and 64.604(c)(3) of the Commission’s Rules.<sup>2</sup>

In its *Second Report and Order*, the Commission required each common carrier providing telephone voice transmission services to provide access via the 711 dialing code to TRS, no later than October 1, 2001.<sup>3</sup> However, in light of certain technical differences between wireline and wireless networks, the Commission allowed wireless carriers who “believe that they will not be able to resolve these issues in a timely manner... to file a report with the Commission stating that their ability to comply with the one-year deadline is in jeopardy.”<sup>4</sup> Accordingly, Chariton Valley is filing this instant jeopardy report with the Commission.

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<sup>1</sup> *The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket No. 92-105, Second Report and Order, FCC 00-257, 15 FCC Rcd 15188, (rel. Aug. 9, 2000) at ¶ 38. (“*Second Report and Order*”).

<sup>2</sup> 47 C.F.R. §§ 64.603 and 64.604(c)(3), as amended by the *Second Report and Order*.

<sup>3</sup> 47 C.F.R. § 64.603.

<sup>4</sup> *Second Report and Order* at ¶ 38.

## **I. Contact Information**

Chariton Valley provides analog and digital commercial mobile radio service (“CMRS”) in rural Missouri and its contact information is as follows:

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Assistant General Manager

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email: pharris@cvalley.net

## **II. Implementation Issues**

Chariton Valley is working on compliance with Sections 64.603 and 64.604(C), paragraph 2, of the FCC Rules in order to provide hearing-impaired persons access to TRS via the 711 dialing code, and to provide education and outreach regarding the new 711 dialing code. For analog 711 calls, Chariton Valley is able to translate the 711 dialing code into the 800 number that accesses its TRS provider. However, Chariton Valley is concerned that it may not be able to translate the 711 code for digital subscribers prior to the Commission’s October 1, 2001 deadline.

As the Commission has noted, there have been numerous technical compatibility issues regarding the ability of digital CMRS networks to provide proper access to TTY devices.<sup>5</sup> However, Chariton Valley, like the FCC, believes the tight deadlines are in the public interest and force carriers and vendors to concentrate on developing solutions. That being said, Chariton Valley will be unable to provide customers with digital phones access to TRS without an upgrade to its switch. Lucent is Chariton Valley’s switch vendor and, according to conversations Chariton Valley has had with Lucent, Lucent will not be able to upgrade its digital switches for digital 711 access until the end of the third quarter of 2001, at the earliest. Chariton Valley is not confident that Lucent’s tentative schedule will allow Chariton Valley to meet the October 1, 2001 deadline. Chariton Valley plans to implement the Lucent upgrade as soon as it becomes available.<sup>6</sup>

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<sup>5</sup> See *In re Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Fourth Report and Order, FCC 00-436, (rel. Dec. 14, 2000).

<sup>6</sup> Notwithstanding its intention to implement the upgrade to allow for digital 711 access, Chariton Valley questions the commercial availability before October 1, 2001 of digital subscriber equipment capable of accessing TRS through the 711 dialing code.

The Commission is also aware of the problems associated with callers roaming outside of their home territory.<sup>7</sup> Chariton Valley is working with both its TRS provider and Lucent to develop a solution to the problem of TRS centers handling roaming calls and/or delivering roaming calls to the customer's home territory. Chariton Valley therefore notes that, at this time, it cannot guarantee that roaming callers in its area can access their home territories by the October 1, 2001 deadline.

Finally, with regard to the Commission's Section 64.604(c)(3) requirement, Chariton Valley believes it will be premature to conduct "ongoing education and outreach programs that publicize the availability of 711 access to TRS"<sup>8</sup> unless Chariton Valley has the switch upgrade necessary to provide such access. As soon as Chariton Valley is certain of the date by which it will be in compliance with the FCC's 711 access to TRS rules, Chariton Valley will begin its 711 outreach programs in earnest.

### **III. Conclusion**

Based upon the foregoing information, Chariton Valley believes, in good faith, that its full compliance with 64.603 and 64.604(c)(3) of the Commission's rules by the October 1, 2001 deadline may be in jeopardy with respect to its digital subscribers and roamers.

Respectfully submitted,

**Missouri RSA #5 Partnership d/b/a  
Chariton Valley Wireless Services**

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/s/

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<sup>7</sup> *Second Report and Order* at ¶ 35.

<sup>8</sup> 47 C.F.R. § 64.604(c)(3), as amended by the *Second Report and Order*.