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Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

Northwest Missouri Cellular L.P. ("Northwest Missouri"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission") *Fourth Report and Order* in CC Docket No. 94-102,¹ hereby files a Quarterly Report for the quarter ending March 31, 2001, detailing its efforts towards attaining digital TTY accessibility, and the status of the various technological solutions that will help it attain that goal.

In the *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community. In order to be assured that the aforementioned deadlines will be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.² Northwest Missouri now files this instant report with the Commission.

I. Carrier Background

Northwest Missouri provides analog and digital CMRS wireless service in the Missouri 1-Atchison RSA.³ Northwest Missouri intends to do everything within its power to comply with the requirements of 20.18(c) of the rules, to provide hearing-impaired persons with TTY access via the 911 dialing code over its digital wireless network. However, the ability for TTY devices to actually transmit calls over the TDMA digital portion of Northwest Missouri's network is wholly dependent upon the availability of the required infrastructure hardware and software and compatible handsets in sufficient time to meet the Commission's deadline. Northwest Missouri respectfully submits that these items are both beyond Northwest Missouri's control. Accordingly, Northwest Missouri has requested information and a status update from its network infrastructure and handset providers regarding their ability to meet the Commission's deadlines.

¹In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 Fcc Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

²*Id.*

³Station KNKN816 (CMA395B3).

II. Access to E911 Through TTY Devices

A. Development Activities

Northwest Missouri does not own its own switch. Rather, Northwest Missouri obtains switching services from Cingular Wireless's ("Cingular") switch in Kansas City, MO to switch Northwest Missouri's Lucent TDMA infrastructure cell site equipment. Accordingly, Northwest Missouri has made inquiries to both Cingular and Lucent regarding the status on their progress in achieving full compliance with the Commission's rules for the Northwest Missouri infrastructure. Northwest Missouri also respectfully refers the Commission to the *Fourth Report and Order*, wherein Lucent reported that its proposed solution to the TTY/digital problem has been approved by the Telecommunications Industry Association Subcommittees TR45.5 (CDMA) and TR45.3 (TDMA) standard bodies.⁴ In the same Report and Order, SWB (now Cingular) agreed with the Commission's proposed deadline of December 31, 2001, as long as the affected carriers were permitted an additional six months (until June 30, 2001) to deploy and test the solution in their systems.⁵ Presently, Northwest Missouri understands that the requisite software which the Commission's rules require to be in place by December 31, 2001, will be hosted on the Cingular switch and not the network infrastructure owned and operated by Northwest Missouri.

Even once the network infrastructure is in place, Northwest Missouri understands that the ability to actually allow 911 access to TTY devices will also be contingent upon the availability of compatible handsets. While Northwest Missouri provides service to a number of brands of certified handsets owned by its subscribers and roamers entering its market, Northwest Missouri's primary handset providers for subscriber equipment sold by Northwest Missouri are Nokia and Motorola. Northwest Missouri has requested that Nokia and Motorola provide information on their progress in achieving full compliance with the Commission's rules with its TDMA handsets. As of this date, the only response Northwest Missouri has received is from its handset distributor advising that "the Motorola and Nokia handsets being sold to Northwest Missouri Cellular, as the FCC acknowledges, do not pass the TTY data with an acceptable error rate." Northwest Missouri has not yet received detailed responses directly from either Nokia or Motorola, and therefore cannot report on their development activities.

B. Testing and Deployment Activities

Once the Cingular system has been upgraded to provide the requisite functionality and compatible handsets become available, Northwest Missouri will perform the appropriate tests. The specific details of a time line to implement 911 access to TRS via TTY devices over the digital wireless network, and other issues related to such implementation, including handset development and testing, are beyond the scope of information which Northwest Missouri can provide. Such questions are more appropriately addressed by equipment vendors because the equipment vendors, and not the licensees, are directly involved in developing compliant equipment.

⁴*Fourth Report and Order*, ¶¶ 3, 4.

⁵*Fourth Report and Order*, ¶ 6.

Because of the lack of available infrastructure hardware and software and compatibly handsets, Northwest Missouri has yet to undertake any testing and development activities.

III. Conclusion

As soon as the issues surrounding TTY access over digital networks are resolved, and assuming they are completed in a timely manner, Northwest Missouri intends to promptly and fully comply with the requirements of the *Fourth Report and Order*, to test and deploy the technology in its system in conjunction with the public safety community by June 30, 2002. Because the December 31, 2001 deadline appears to apply only to software required on the network switch owned by Northwest Missouri's switching vendor, it does not appear as though this deadline for implementing this software is directly applicable to the Northwest Missouri network nor is it within Northwest Missouri's control. As required, Northwest Missouri will provide the Commission with quarterly updates on the status of development and deployment, as advised by Northwest Missouri's infrastructure, handset and switching service vendors and, if necessary, will seek a waiver of the applicable deadlines if the requisite equipment and software does not actually become available in sufficient time to enable Northwest Missouri to meet the deadlines.

Respectfully Submitted,

Northwest Missouri Cellular L.P.

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It's Attorneys

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CERTIFICATE OF SERVICE

I, Carol A. Mindzak, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 13th day of April 2001, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a diskette copy of this report with the Federal Communications Commission’s copy contractor, International Transcription Service. In addition, on this date, I have served copies of this Report via hand delivery or e-mail to the following:

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