

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST
2120 L STREET, NW
WASHINGTON, DC 20037

ORIGINAL

HAROLD MORDKOFKY
BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
KATHLEEN A. KAERCHER
MICHAEL B. ADAMS, JR.
DOUGLAS W. EVERETTE

(202) 659-0830
FACSIMILE: (202) 828-5568

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON
OF COUNSEL

PERRY W. WOOFER
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ
DIRECTOR OF ENGINEERING
PRIVATE RADIO

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ARTHUR BLOOSTON
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

WRITER'S CONTACT INFORMATION

(202) 828-5520
halmor@bloostonlaw.com

Magalie Roman Salas, Secretary
Federal Communications Commission
Washington, D.C. 20554

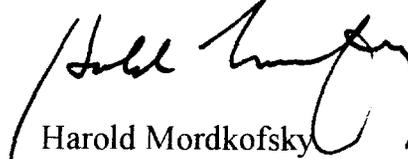
Re: **CC Docket No. 94-102**
Broadband PCS Stations KNLG248, KNLG841,
KNLG842, KNLG843 and KNLG844
First Quarterly Report

Dear Ms. Salas:

On behalf of Whidbey Telephone Company, we are submitting herewith its first quarterly report addressing the requirements in CC Docket No. 94-102 for digital wireless systems to provide TTY access to E-911 emergency calling systems.

Please refer any questions or correspondence to this office.

Very truly yours,



Harold Mordkofsky
Attorney for Whidbey Telephone Company

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WHIDBEY TELEPHONE COMPANY
14888 SR 525
Langley, Washington 98260

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: CC Docket No. 94-102
Broadband PCS Stations KNLG248, KNLG841,
KNLG842, KNLG843 and KNLG844
First Quarterly Report

Dear Ms. Salas:

This report is filed pursuant to the Commission's *Fourth Report and Order*, in CC Docket No. 94-102, released December 14, 2000, even though it is not certain whether we are required to make this filing at this time.

Whidbey Telephone Company (Whidbey) is the licensee of stations KNLG248 (F Block – Aberdeen, Washington BTA), KNLG841 (E Block – Bellingham, Washington BTA), KNLG842 (F Block – Bremerton, Washington BTA), KNLG843 (E Block – Port Angeles, Washington BTA) and KNLG844 (F Block – Port Angeles, Washington BTA) in the Broadband Personal Communications Service (PCS). These licenses were won in Auction No. 11 and granted on April 28, 1997. Accordingly, the first buildout deadline is April 28, 2002. Construction of the licensed facilities has not yet begun.

Reading together the *Fourth Report and Order* and Sections 20.18(a) and (c) of the Commission's Rules, it appears that the quarterly report filing requirement applies only to wireless systems that are already in operation, by stating that these requirements are applicable only to "service providers" and "carriers operating digital wireless systems." Since we are not yet providing service, it appears that we are not required to file this report. Accordingly, we are filing this report only to preclude any inquiry from the Commission that might otherwise be forthcoming.

We wish to assure the Commission, nevertheless, that we will comply with the requirements of Section 20.18 of the Commission's Rules once our licensed facilities have been constructed and are providing service.

Respectfully submitted,

Whidbey Telephone Company

By: 
Officer

Dated: 4-12-01