

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  
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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

April 16, 2001

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OFFICE OF THE SECRETARY

WRITER'S CONTACT INFORMATION

202-828-5540  
jap@bmjd.com

ARTHUR BLOOSTON  
1914 - 1999

*By Hand Delivery*

Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, NW, Room TW-A325  
Washington, D.C. 20554

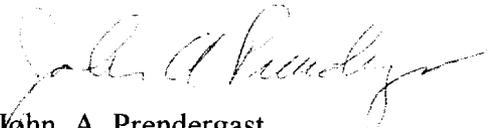
**Re: Conestoga Wireless Company  
First Quarterly TTY Implementation Report  
CC Docket No. 94-102**

Dear Ms. Salas:

On behalf of Conestoga Wireless Company ("Conestoga") and pursuant to the directive contained in the Commission's *Fourth Report and Order* in CC Docket No. 94-102, FCC 00-436 (*rel.* December 14, 2000), we are transmitting herewith the original and four copies of its "First Quarterly Report" concerning TTY digital deployment.

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

Very truly yours,

  
John A. Prendergast  
Counsel to Conestoga Wireless Company

Attachment

cc (w/att): Kris Moneith  
Pam Gregory  
Mindy Littell

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Conestoga Wireless Company  
215 West Philadelphia Ave.  
Boyertown, PA 19512

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April 12, 2001

Ms. Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

**Re: *First Quarterly TTY Implementation Report / CC Docket No. 94-102  
Conestoga Wireless Company***

Dear Ms. Salas:

Conestoga Wireless Company ("Conestoga") hereby submits its first quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000. Conestoga is licensed to provide broadband PCS services in the following BTA markets:

Market	Block	Sub	Call Sign	Market Name
BTA360	C		WPOJ725	Pottsville, PA
BTA370	C	2	WPOJ726	Reading, PA
BTA429	C		WPOJ727	State College, PA
BTA437	C		WPOJ728	Sunbury-Shamokin, PA
BTA475	C		WPOJ729	Williamsport, PA
BTA360	D		KNLF905	Pottsville, PA
BTA370	D		KNLG701	Reading, PA
BTA437	D		KNLG945	Sunbury-Shamokin, PA
BTA475	D		KNLG703	Williamsport, PA

Conestoga's digital wireless network is currently using GSM infrastructure equipment from Nortel. As a result, Conestoga is dependent on Nortel for the implementation of a digital TTY solution. Once the Nortel TTY solution becomes commercially available, Conestoga will implement the solution throughout its network.

It is Conestoga's understanding that Nortel will be filing a TTY capability status report through the TTY Forum. Conestoga therefore directs the Commission to Nortel's report for specific information regarding the company's TTY development and deployment activities. Conestoga assures the Commission that it will make every effort to implement TTY capability in its markets by the June 30, 2002 deadline.

Respectfully Submitted,

**CONESTOGA WIRELESS COMPANY**

A handwritten signature in black ink, appearing to read "W.D. Chamblin, III". The signature is written in a cursive style with a large, stylized initial "W" and a circular flourish at the end.

William D. Chamblin, III  
President

## Conestoga Wireless Company

In response to the Federal Communication Commission's ("FCC"), Fourth Report and Order in the E-911 docket,<sup>1</sup> Conestoga Wireless Company ("Conestoga") hereby provides the FCC staff with further information to supplement its first quarterly TTY implementation status report ("Report"). Conestoga holds C- and D-Block broadband PCS licenses in the basic trading area ("BTA") markets of Pottsville, PA (BTA360), Reading, PA (BTA370), State College PA (BTA429), Sunbury-Shamokin, PA (BTA437) and Williamsport, PA (BTA475).

Conestoga is a small PCS carrier in central Pennsylvania that is using Nortel GSM equipment for both its switching system and base station hardware. Currently, our Company is running its base stations on Nortel BSS software Version 11. The FCC is requiring wireless operators to support TTY technology by December 31, 2001. This would allow a user to place a 911 call using a text telephone machine and their wireless handset. It is our understanding that we will need to upgrade to Nortel's BSS Version 13.2 in order to support this TTY application. In addition, we will likely need to replace major hardware components such as base station controllers (BSC) and transcoder units (TCU) in order to support this functionality. Nortel has indicated that the required BSS software will not be generally available until December 2001. It is Conestoga's experience that the availability of software releases for smaller carriers is usually delayed somewhat from the announced availability date for major carriers. Therefore, unless the TTY technology development and testing for GSM systems advances more quickly than the current schedule, Conestoga may not be in a position to install the requisite software and hardware in time to meet the December 31, 2001 deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment to make their systems capable of transmitting calls from TTY devices. Such a software and equipment delay would also impair Conestoga's ability to integrate, test and deploy the technology in conjunction with the public safety community.

Conestoga uses Nokia handsets and although it appears they are prepared to make interconnect cable solutions generally available, it is not clear that Standards bodies have finalized the requirements for mobile terminal software.

For these reasons, Conestoga Wireless is concerned that it will be unable to meet deadlines imposed by the FCC for TTY compliance. Conestoga believes that many other small carriers, especially those using GSM technology in their wireless networks, are facing similar problems in equipping their networks with TTY functionality. It is Conestoga's desire to make its GSM network accessible to the deaf and hearing impaired community as soon a solution becomes available. In this regard, Conestoga will work closely with its vendors and will do whatever it can to help hasten the development and deployment of digital TTY capability throughout its network.

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<sup>1</sup>/ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Fourth Report and Order, CC Docket No. 94-102, FCC 00-436 (rel. Dec. 14, 2000), 65 Fed. Reg. 82,293 (Dec. 28, 2000).