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July 12, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

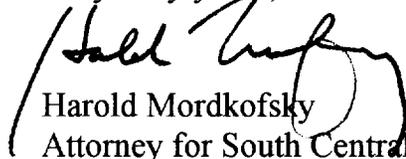
Re: **CC Docket No. 94-102**
Broadband PCS Station KNLG223
BTA 392 (St. George, Utah)
Second Quarterly Report

Dear Ms. Salas:

On behalf of South Central Utah Telephone Association, we are submitting herewith its second 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 South Central Utah
Telephone Association

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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 Station KNLG223
BTA 392 (St. George, Utah)
Second 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.

South Central Utah Telephone Association (South Central), a rural area telephone cooperative, is the licensee of the referenced station in the Broadband Personal Communications Service. South Central serves the St. George, Utah BTA on the PCS F- block. We commenced service with 12 original PCS sites and two repeater sites. The majority of the populated land area outside of the main population areas of St. George and Cedar City is rural and will be costly to build out. Though we have satisfied our construction requirements, there are many very small communities that have yet to be served. We began last year to fulfill our commitment to these communities by building six new PCS sites and three repeater sites. We hope to expand our service further into these rural areas as the market and funding allow.

We have been following the progress of the Wireless TTY Forum and working with our switch supplier, Nortel Networks, at its Parker, Colorado location, toward effecting compliance with the Commission's requirements for providing TTY access to E-911 calling systems over our PCS facilities. Our progress as of June 30, 2001 is summarized below using the outline at paragraph 17 of the *Fourth Report and Order*:

Development Activities

1. Network infrastructure software development – South Central completed its last switch upgrade at the end of 2000 on a scheduled PCL Simplification program

(software and hardware upgrades) that allows licensees to keep up with product loads on a scheduled basis.

2. Handset development and testing plans – South Central purchases its handsets from many of the vendor outlets. We make every effort to stay current with the latest handset offering. In the past, however, we have had limited choices due to exclusive agreements between some of the handset manufacturers and some of the larger nationwide carriers, or due to large quantity orders placed by the big carriers, which deplete supplies.
3. Beta testing and lab testing – South Central is a small carrier operating on the F-block. While we have no lab testing facilities of our own, we follow the testing and development done by the manufacturers and the larger carriers. Then, we field-test the approved units when they become generally available. We will rely on advice and approved setup instructions provided by the manufacturers and suppliers when placing new equipment into service.
4. Release and general availability to carriers of network infrastructure software – The software release required for digital TTY support on our Nortel DMS-100 switch is LWW-00007 and the Nortel Base Station Controller equipment requires NBSS 10.1. As of June 31, 2001, we were at the LWW-00006 software level on our DMS-100 and NBSS 8.1 on our Base Station Controller.

On June 8, 2001, Nortel gave us notice that the dual switching platform we are currently using is going to be phased out and replaced by two completely separate wireless and landline switch platforms, leaving us with the original landline switch and a new separate wireless switch. These will operate using the standard landline and wireless software packages, which we will be able to upgrade and operate independently of one another. This will offer the advantage of upgrade flexibility but probably have the drawback of higher upgrade costs and higher operating and maintenance costs to the company, due to the additional expense of maintaining two front-end processors and additional hardware. Details of the costs to reach the new platform are not yet known. But the prospect of significantly greater costs causes us concern due to our very limited budget.

With the new platforms we will be moved to, the software release required for digital TTY support on our Nortel DMS-100 Wireless Switch is MTX09 and the Nortel Base Station Controller equipment will still require NBSS 10.1.

As of June 30, 2001, we were still providing services to both landline and wireless customers on a single DMS-100 Switch platform, which uses a combination landline and wireless software load. We remain at LWW0006, which is the equivalent

software level of MTX08 Wireless and LEC10 Landline software loads for our DMS-100 and NBSS 8.1 on our Base Station Controller.

5. Availability to carriers of full acceptance test units – See 2 above. We do occasionally receive some units for field trial and testing. However, no units for testing TTY compatibility have been made available to us up to this time.
6. Efforts toward achieving digital wireless solution compatibility with enhanced TTY devices – South Central will work toward another switch upgrade program (PCL Simplification) with Nortel, as our limited budget allows. We will also continue to follow the progress of the TTY Forum.

Testing and Deployment Activities

7. Carrier coordination of testing with PSAP – We are continuing work with QWEST and the related PSAPs within our service area to finalize and finish various landline projects. As of June 30, 2001, we have received no requests for E-911 Phase I or Phase II or TTY compatibility testing.
8. Carrier testing activities, including field testing, consumer end-to-end testing and other necessary tests – As described above:

Necessary hardware and software loads have not yet been reached. No testing can begin before this occurs.

- We have had no correspondence from handset manufactures and are not currently aware of compliant or network compatible handsets for our use.
- South Central is not a priority carrier to handset manufacturers and so it is likely that we will not be among the first to be supplied with compatible equipment for testing or resale.
- As of June 30, 2001, no correspondence has come forth from handset manufactures to inform South Central of any changes or enhancements available for our testing.
- On May 24, 2001, we received email from Judy Harkins, Norman Williams and Paula Tucker from Technology Access Program, Gallaudet University about some tools they have been working on, for partial automation of data collection and measuring error rate of TTY over wireless telephones in field conditions. The tools were made available for download free of charge at: <http://tap.gallaudet.edu/ttytools>. Norman Williams is the author of the software. This was not submitted as a test plan. The tools consisted of data collection software, scoring software, scripts, and documentation. They did not deal with VCO. They said they might publish additional versions if there was interest and if they could work the requested additions into their project.

Because few TTY's, even with modification, can receive data from an external device or send to an external device, a limited number of TTY products are supported by the system. However, the three were hopeful that the tools would prove useful.

- As of June 30, 2001, no handset testing can be done, since the switch doesn't support TTY (See 2 and 5 above). We can't make an assessment of the above tools at this time.

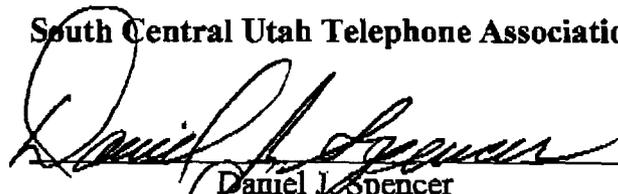
9. Retail availability of necessary consumer equipment – See 8 above.

10. Geographic scope of network infrastructure deployment – None as of June 30, 2001.

Respectfully submitted,

South Central Utah Telephone Association

By:


Daniel J. Spencer
General Manager & Treasurer

Dated: 7-12-01