DOCKET FILE COPY ORIGINAL

ORIGINAL

KURTIS & ASSOCIATES, P.C.

SUITE 600
2000 M STREET, N.W.
WASHINGTON, D.C. 20036

(202) 328-4500
TELECOPIER (202) 328-1231

RECEIVED

JUL 16 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Illinois Valley Cellular RSA2-III Partnership dba Illinois Valley Cellular ("Illinois Valley"), 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 June 30, 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] Illinois Valley now files this instant report with the Commission.

I. Carrier Background

Illinois Valley provides analog and digital CMRS wireless service in the Illinois 2-Bureau RSA.[3] Illinois Valley 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 Illinois Valley'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. Illinois Valley respectfully submits that these items are both beyond Illinois Valley's control. Accordingly, Illinois Valley has requested information and a status update from its network infrastructure and handset providers regarding their ability to meet the Commission's deadlines.

---

[1]In 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.*

[3]Station KNKN581 (CMA395B3).

No. of Copies rec'd 0+4
List ABCDE

II. Access to E911 Through TTY Devices

A. Development Activities

Illinois Valley utilizes analog AMPS and TDMA digital equipment provided by Nortel Networks ("Nortel") for its wireless network infrastructure. In response to Illinois Valley's inquiry, Nortel has provided a status update on its progress in achieving full compliance with the Commission's rules for the Illinois Valley infrastructure. Nortel's response is appended hereto as **Exhibit A**. Illinois Valley is not independently capable of verifying the information presented below, but has no reason to believe that it is not accurate.

While Illinois Valley provides service to a number of brands of certified handsets owned by its subscribers and roamers entering its market, Illinois Valley's primary handset provider for subscriber equipment sold by Illinois Valley are Nokia and Motorola. Illinois Valley has requested that Nokia and Motorola provide information on their progress in achieving full compliance with the Commission's rules with their TDMA handsets. Motorola's response is appended hereto as **Exhibit B**. Illinois Valley is not independently capable of verifying the information presented therein, but has no reason to believe it is not accurate. Illinois Valley has not yet received a response from Nokia, and therefore cannot report on its development activities. Last quarter, however, Nokia provided this information directly to the Commission in its own quarterly report. Illinois Valley presumes that Nokia will follow the same procedure for this quarter.

The appended information from Nortel and Motorola is respectfully submitted in response to these issues, as required in the Commission's *Fourth Report and Order* (rel. Dec 14, 2000).

(1) Network Infrastructure Software Development

(2) Handset Development and Testing Plans

(3) Beta Testing and Lab Testing

(4) Release and General Availability to Carriers of Network Infrastructure Software

(5) Availability to Carriers of Full Acceptance Test Units

(6) Efforts Toward Achieving Digital Wireless Solution Compatibility With Enhanced TTY Devices

B. Testing and Deployment Activities

Once equipment becomes available, Illinois Valley 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 tied to the technical specifications of the subscriber equipment that is being developed to provide TTY compatible service. As such, they are beyond the scope of information which Illinois Valley 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.

Because of the lack of available infrastructure hardware and software and compatibly handsets, Illinois Valley has yet to undertake any testing and development activities. However, Nortel's response has included some recommended testing procedures which, as of this point in time, Illinois Valley intends to follow once the requisite infrastructure and subscriber hardware and software is available. The Nortel and Motorola responses address these issues, as set forth in the Commission's *Fourth Report and Order*.

(7) Carrier Coordination of Testing With PSAP

(8) Carrier Testing Activities, Including Field Testing, Consumer End-to-end Testing, and Other Necessary Tests

(9) Retail Availability of Necessary Consumer Equipment

(10) Geographic Scope of Network Infrastructure Deployment

III. Conclusion

As soon as the issues surrounding TTY access over digital networks are resolved, and assuming they are completed in a timely manner, Illinois Valley intends to promptly and fully comply with the requirements of the *Fourth Report and Order*, to obtain all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices by December 31, 2001, and to integrate, test and deploy the technology in their systems in conjunction with the public safety community by June 30, 2002 but, respectfully submits, that its ability to do so, as of this point in time, remains entirely beyond its control. As required, Illinois Valley will provide the Commission with quarterly updates on the status of development and deployment, as advised by Illinois Valley's infrastructure and handset 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 Illinois Valley to meet the deadlines.

Respectfully Submitted,

Illinois Valley Cellular RSA2-III Partnership dba
Illinois Valley Cellular

July 16, 2001

Anna Ward

Michael K. Kurtis
Anna E. Ward

It's Attorneys

Kurtis & Associates, P.C.
2000 M Street, N.W.
Suite 600
Washington, D.C. 20036
(202) 328-4500

EXHIBIT A

Nortel's TDMA TTY Solution

June 6, 2001

Background:

FCC has mandated that wireless carriers provide E911 Emergency services to users with speech and hearing disabilities who communicate with TTY/TDD devices. The FCC deadline is for carriers to acquire solution hardware and software by December 31, 2001, and to offer service by June 30, 2002.

Nortel's TDMA TTY Solution

Nortel's TDMA TTY is supported on the DMS-MTX platform via MTX10 software release, which is scheduled to be channel ready on November 30, 2001.

Standards Compliance

Nortel's TDMA TTY solution is compliant to IS-823A and EIA-136-410 standard.

Status Update:

Nortel Networks has completed the development of the feature. Current plans for TTY deployment are critically dependent upon handset availability including test units. Nortel has tested the feature using the only available alpha/beta handsets from Panasonic with better than 95% pass rate. However, we'd like to caution that this testing has been done with prototype mobiles of only one mobile vendor. We anticipate receiving prototype handsets from other vendors shortly and will conduct the testing with those handsets as well.

At this point the TTY feature in MTX10 is being termed a "prep" feature due to the unavailability of commercial grade handsets. Nortel Networks plans to make this feature available as part of MTX10 pending the availability of the stable test handsets from at least 2 vendors.

EXHIBIT B

MOTOROLA
TTY COMPATIBILITY DEVELOPMENT STATUS REPORT
2nd Quarter 2001

Product	Standard	Status	Milestones	Progress
CDMA Handset	IS 127-3 IS 733-2	System Test	IOT: June 2001 UI: August 2001 SA: 1Q 2002	Motorola infrastructure testing began March 2001.
GSM Handset	TS 26.226 TS 26.230 TR 26.231	Implementation	IOT: September 2001 UI: September 2001 SA: 1Q 2002	CTM implementation verified bit exact with the standard. Optimization and integration activities in progress. NOTE: proposed standard changes have an undetermined delay on delivery schedule.
iDEN Handset		System Test	On plan	CER tests are in progress
TDMA Handset	IS 823-A IS 840-A	Integration	IOT: July 2001 UI: August 2001 SA: 1Q 2002	Ballot version of IS-823-A implemented. Infrastructure tests to date have CER < 1%.
CDMA Infrastructure	IS 127-3 IS 733-2	Ready for FOA		Infrastructure software in field has digital TTY support available now. Only handsets are needed to commence testing.
iDEN Infrastructure		System Test[4]	On plan	CER tests are in progress.

Note: Motorola works with its carrier customers to provide them specific information related to their respective products.

Note: IOT is Inter Op Testing with RAM based parts for Character Error Rate testing
UI is User Interface testing with HCO / VCO support
ROM is availability of ROM based phones. These should be functionally identical to a RAM phone.
SA is Ship Acceptance of production volume quantities

Al Lucas
Office of Access Excellence
Motorola
Phone: 561-739-2505
TTY: 561-739-2506

[4] iDEN System Release 9.6 (SR9.6) System Test is in progress.

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 16th day of July 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:

Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Jim Schlichting, Chief
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C254
Washington, D.C. 20554

Pam Gregory, Chief
Disabilities Rights Office
Consumer Information Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-C415
Washington, D.C. 20554

Melinda S. Littell*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A161
Washington, D.C. 20554
mlittell@fcc.gov

Carol A. Mindzak

Carol A. Mindzak

* Sent via e-mail