

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Revision of the Commission’s Rules ) CC Docket No. 94-102  
to Ensure Compatibility with Enhanced )  
E911 Emergency Calling Systems )  
 )

To: The Commission

**Carrier Report Regarding  
Implementation of Wireless E911 Phase II Automatic Location Identification**

Farmers Mutual Telephone Company (“Farmers”), operating in BTA050 in Boise, Idaho, commenced the provision of PCS service on August 29, 2001 and, in accordance with the Federal Communications Commission’s (“FCC” or “Commission”) *Further Memorandum Opinion and Order* in the above-captioned proceeding and Section 20.18(i) of the Commission’s Rules, hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification (“ALI”).

**I. Background / Contact Information**

Farmers serves rural Idaho and its contact information is as follows:

Jay Garrett  
General Manager

Farmers Mutual Telephone Company (TRS# 801972)  
319 SW 3<sup>rd</sup> Street  
P.O. Box 1030  
Fruitland, ID 83619  
telephone: (208) 452-4241  
fax: (208) 452-5341

**II. E911 Phase II Location Technology Information**

Farmers has chosen a handset-based solution for its Phase II ALI technology. Farmers has been exploring the offerings of various vendors of handset solutions, but has yet to choose a vendor. Farmers plans to select a vendor when an ALI-capable handset that is technically compatible with Farmers’ network finally becomes commercially available. Farmers plans to use the same technology, once selected, throughout its service area.

### **III. Testing and Verification**

Since Farmers is still examining multiple handset-based vendors, it has not conducted any testing so far. Farmers anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of the technology it eventually chooses.

### **IV. Implementation Details and Schedule**

Farmers believes the earliest and most optimistic date by which the large, nationwide carriers will see delivery of ALI-capable handsets is by March 2002. Accounting for expected delays before CDMA handsets reach a small carrier such as Farmers and necessary testing, Farmers does not expect to be capable of selling and activating handsets prior to October 2002. Accordingly, Farmers has developed the following implementation schedule: Farmers will begin selling and activating ALI-capable handsets on October 1, 2002. Farmers will ensure that at least 25 percent of its activated handsets are ALI-capable by December 31, 2002. Farmers will ensure that at least 50 percent of its activated handsets are ALI-capable by June 30, 2003, and that 100 percent of its activated handsets are ALI-capable by December 31, 2003. Farmers also expects a 95 percent penetration rate of ALI-capable handsets among its subscriber base by December 31, 2006.

### **V. PSAP Interface**

Farmers has yet to receive a Phase II PSAP request. Farmers expects significant software and hardware changes in order to transmit Phase II data to PSAPs.<sup>1</sup> However, the majority of the transmission details remain up to the PSAP.

### **VI. Handset Information**

Since no handsets are available yet, nor are any prices, Farmers has been unable to develop a concrete strategy for handset replacement or how to handle incompatible handsets. The price of ALI-capable handsets, unavailable at this time, will affect Farmers' replacement strategy. Farmers is concerned about incompatible handsets, especially with regard to roaming subscribers and is still in the process of comparing vendors and the vendors chosen by its major roaming partners to adequately address the incompatibility issue. Farmers plans to aggressively promote its new ALI-capable handsets when they become available to Farmers.

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<sup>1</sup> In general, the following hardware and software is needed to transmit Phase II data to PSAPs: IS41C – Dialed Number Trigger, E911 Software, MPC – Mobile Positioning Center, PDE – Position Determining Entity, and receivers at each cell site.

## **VII. Other Information**

Farmers notes that the remote and rural nature of its service territory in Idaho can present additional and unforeseen problems when installing and testing location technology. Farmers would have a much better handle on how it will eventually implement its Phase II plan if the vendor products were available for testing. Unfortunately, Farmers' Phase II implementation plan depends, in large part, upon the schedules and plans of the vendors.

September 26, 2001

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