

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Revision of the Commission's Rules) CC Docket No. 94-102
To Ensure Compatibility with)
Enhanced 911 Emergency Calling Systems)
)

To: Wireless Telecommunications Bureau

ERRATA

On September 20, 2001, Leaco Cellular, Inc. ("Leaco") filed with the Federal Communications Commission ("FCC" or "Commission") a petition for limited waiver of Sections 20.18(e) and (g) of the Commission's rules. Page 2 of the petition contains a factual error regarding Leaco's Phase II Carrier Implementation Report.

Please find attached replacement page 2 of Leaco's Petition for Waiver, which contains the corrected text. We request that this page be inserted in the petition in place of the original page 2. We apologize for any inconvenience this has caused the Commission.

Respectfully submitted,

LEACO CELLULAR, INC.

By: _____/s/_____

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Its Attorneys

Dated: September 26, 2001

equipment, Leaco will be unable to meet the October 1, 2001 deadline in most of its service area and respectfully requests an extension as outlined below.³

I. Leaco Is Unable to Meet the FCC's October 1 Handset Availability Deadline Due to Factors Outside of Its Control

Leaco is a small cellular carrier providing service in rural New Mexico (Lincoln, New Mexico RSA 6, CMA 558). Leaco has been working diligently with its main supplier, Lucent, to develop a Phase II solution for its service area. As Leaco reported in its Phase II implementation reports, Leaco has been exploring and selected a handset-based solution to achieve Phase II compliance. Leaco's Phase II solution will require a new software load in its switch, hardware changes consisting of a new processor for its switch and assorted cell site upgrades, as well as automatic location information ("ALI")-capable handsets. As discussed in detail below, vendor-associated delays in delivery of each of these elements will prevent Leaco from meeting its relevant Phase II deadlines in the vast majority of its service area.

Leaco will order an upgrade to its switch software in the form of the Lucent 5ESS switch release 5E15 FRZ, which is part of MSC release R17.1 when it is available⁴ and will add location center hardware in order to transmit Phase II data to PSAPs. In April, Lucent promised Leaco that the R17.1 upgrade would be commercially available in September 2001. However, as Qwest recently noted, Lucent now expects three-month delays in order to provide ALI-capable software and hardware.⁵ Based on past

³ Leaco plans to use a network-based solution in the few areas of its rural network where cell site density might make a network-based solution technically possible. In such areas, Leaco does not anticipate that a waiver will be necessary. Leaco notes that it has yet to receive a Phase II request from any Public Safety Answering Point ("PSAP").

⁴ At this time, Lucent is not accepting orders for the R17.1 upgrade.

⁵ See Qwest Amended Petition for Waiver at 2.

CERTIFICATE OF SERVICE

I, Joy Barksdale, do hereby certify that on this 26th day of September 2001, a copy of the foregoing Errata was served by hand delivery to the following parties:

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/s/
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