

**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, Advantage Cellular Systems, Inc. ("Advantage") 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 Advantage's Phase II Carrier Implementation Report.

Please find attached replacement page 2 of Advantage'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,

**ADVANTAGE CELLULAR SYSTEMS,
INC.**

By: _____ /s/ _____

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Its Attorneys

Dated: September 26, 2001

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

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

Advantage is a small cellular carrier providing service in rural Tennessee (Cannon, Tennessee RSA 2, CMA644). Advantage has been working diligently with its main supplier, Nortel, to develop a Phase II solution for its service area. As it reported in its Phase II implementation reports, Advantage has been pursuing and selected a handset-based solution to achieve Phase II compliance. The TDMA technology which Advantage has selected uses both cell sector identification and Global Positioning System ("GPS") technology. Advantage's 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 Advantage from meeting its relevant deadlines in its service area.³

Advantage will order an upgrade to its software in the form of the Nortel MTX10 feature addition when it is available⁴ and will add location center hardware in order to transmit Phase II data to PSAPs. According to its latest timeline, Nortel promises that the MTX10 upgrade will be made commercially available in December 2001.⁵ However, Nortel has yet to provide Advantage with a delivery date. Based on past experience, Advantage expects a three to four month delay to allow for delivery and testing.

³ Advantage has yet to receive a Phase II request from any Public Safety Answering Point.

⁴ At this time, Nortel is not accepting orders for the MTX10 upgrade.

⁵ See CMS of St. Cloud Petition for Waiver at 3.

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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