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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:) Blanca Telephone Company
) TRS Number: 804621
E911 Phase II Implementation Report)
)
)
To: Wireless Telecommunications Bureau

REQUEST FOR WAIVER OF HANDSET PHASE-IN DEADLINES

Blanca Telephone Company, by its attorney, hereby requests waiver of the E911 Handset Phase-In rules found at 47 C.F.R. § 20.18(g). In support whereof, the following is respectfully submitted:

Blanca's November 8, 2000 *E911 Phase II Implementation Report* states that Blanca intends to utilize a hybrid solution provided by Nortel to bring its cellular system into E911 Phase II compliance. Blanca has not yet received a PSAP request for E911 service so a waiver may not be required given the hybrid nature of the planned E911 location technology. See 47 C.F.R. § 20.18(f) (network based systems do not begin system phase-in until 6 months after PSAP request for service). However, because the hybrid system will also utilize handset technology, and because 47 C.F.R. § 20.18(g) requires that carriers begin selling and activating Phase II compliant handsets by October 1, 2001, waiver of that requirement is hereby sought. Blanca is not aware that any Phase II compliant handsets are available and Blanca continues to work with Nortel to achieve prompt compliance. However, because Blanca does not control the handset manufacturing process, Blanca is prevented from complying due to circumstances beyond its control and a six month waiver and extension of the deadlines in § 20.18(g) is appropriate.

Contact person responsible for this request:

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