

**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 21, 2001, CGKC&H No. 2 Rural Cellular Limited Partnership ("CGKC&H") 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 CGKC&H's service area.

Please find attached replacement page 2 of CGKC&H'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,

**CGKC&H NO. 2 RURAL CELLULAR  
LIMITED PARTNERSHIP**

By: \_\_\_\_\_/s/\_\_\_\_\_

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general availability of Phase II equipment, CGKC&H will be unable to meet the October 1, 2001 deadline in most of its service area and respectfully requests an extension as outlined below.<sup>3</sup>

**I. CGKC&H Is Unable to Meet the FCC’s October 1 Handset Availability Deadline Due to Factors Outside of Its Control**

CGKC&H is a small cellular carrier providing service in rural Texas (Texas RSA 15B3). CGKC&H has been working diligently with its main supplier, Nortel, to develop a Phase II solution for its service area. As CGKC&H reported in its Phase II implementation report, CGKC&H has selected a hybrid solution to achieve Phase II compliance. The Nortel TDMA technology, which CKC&H has selected, uses both cell sector identification and Global Positioning System (“GPS”) technology. The location technology also uses a locating function within or as an overlay to the wireless network infrastructure using a combination of Time Difference of Arrival (“TDOA”) and Angle of Arrival (“AOA”) functions. CGKC&H’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 CGKC&H from meeting its relevant Phase II deadlines in the vast majority of its service area.

CGKC&H will order an upgrade to its software in the form of the Nortel MTX10 feature addition when it is available<sup>4</sup> 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

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<sup>3</sup> CGKC&H 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, CGKC&H does not anticipate that a waiver will be necessary. CGKC&H notes that it has yet to receive, nor does it expect to receive in the near future, a Phase II request from the Public Safety Answering Points (“PSAP”) that it serves.

<sup>4</sup> At this time, Nortel is not accepting orders for the MTX10 upgrade.