

**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: Wireless Telecommunications Bureau

**Second Supplemental Report of Advantage Cellular Systems, Inc. Regarding
Implementation of Wireless E911 Phase II Automatic Location Identification**

Advantage Cellular Systems, Inc. ("Advantage"), by its attorneys and pursuant to Section 20.18(i) of the Rules and Regulations of the Federal Communications Commission ("FCC" or "Commission"), hereby submits a second supplement to its E911 Phase II Carrier Implementation Report.¹

Implementation Schedule

In its November 9 Report, Advantage stated its intent to begin selling ALI-capable handsets on October 1, 2001. However, as indicated in its petition for waiver of Sections 20.18(e) and (g), filed on September 20, 2001, Advantage now believes the earliest and most optimistic date by which the large, nationwide carriers will see delivery of ALI-capable handsets is December 2001. Accounting for expected delays before such handsets reach a small carrier such as Advantage and necessary testing, Advantage does not expect to be capable of selling and activating handsets prior to October 2002.

Accordingly, Advantage has developed the following revised implementation schedule:

October 1, 2002: begin selling and activating ALI-capable handsets.

December 31, 2002: 25 percent of activated handsets are ALI-capable.

June 30, 2003: 50 percent of activated handsets are ALI-capable.

December 31, 2003: 100 percent of activated handsets are ALI-capable.

December 31, 2006: 95 percent penetration rate of ALI-capable handsets.

PSAP Status

In its November 9 Report, Advantage reported that it had been working with the Tennessee E911 Board on Phase I implementation. The Tennessee E911 Board finished its implementation plans by the first quarter of 2001, and Advantage's Phase I status for its eight county public safety answering points ("PSAPs") is as follows:

- (1) Two counties are fully implemented.
- (2) In four counties, Advantage is Phase I capable and is waiting on the PSAPs to complete implementation.
- (3) The remaining two counties have not requested Phase I service.

¹ Advantage filed its initial Report on November 9, 2000 and its first Supplemental Report on December 22, 2000.

Advantage notes that it is still without a Phase II request and the Tennessee E911 Board is still working on its Phase II plans.

Respectfully submitted,

**ADVANTAGE CELLULAR
SYSTEMS, INC.**

By: _____/s/_____

Michael R. Bennet
Bennet & Bennet, PLLC
1000 Vermont Avenue, NW
Tenth Floor
Washington, DC 20005
202-371-1500

Its Attorneys

October 26, 2001