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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Revision of the Commission’s Rules) **CC Docket No. 94-102**
To Enhance Compatibility With)
Enhanced 911 Emergency Calling)
System)
To: Chief, Wireless Telecommunications Bureau

REQUEST FOR RULE WAIVER

WAIVER REQUEST

1. Unicom, Inc., (“Unicom”), (TRS# 801907) hereby requests a temporary waiver of the Section 20.18(g) of the Commission’s rules to allow it to delay the phase-in of deployment of a handset-based technology in meeting the Commission’s requirement for implementing E-911 Phase II service. Specifically, Unicom requests waiver of Section (1) of Paragraph (g) which requires that it begin selling and activating location-capable handsets no later than October 1, 2001.

1 WAIVER STANDARDS

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3 2. In its *Fourth Memorandum Opinion and Order*, FCC 00-326, Released September 8,
4 2000, the Commission indicated that the Phase II rules are intended to be applied in a manner that takes
5 into account the practical and technical realities faced by a carrier.¹ Further in that Order, the
6 Commission set out the general approach to waiver requests,² and provided that waivers may be granted
7 for good cause shown consistent with Section 1.3 of the Commission’s Rules.³

8

9 BACKGROUND

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11 3. Unicom is the licensee for the Frequency Block B cellular system in the Alaska 1 - Wade
12 Hampton and Alaska 2 - Bethel areas⁴ and the Frequency Block A cellular system in the Alaska 2 -
13 Bethel area.⁵ In the E-911 implementation report filed concurrently with this waiver request, Unicom,
14 if required to make a choice in order to continue cellular service, would deploy a handset-based
15 automatic Location Information (“ALI”) technology, subject to and contingent upon the ultimate
16 availability of cost-effective ALI equipment. In Bethel and Chuathbaluk, Unicom’s present cellular
17 system utilizes WACS8 analog equipment manufactured by Harris Canada, Inc. The equipment is no
18 longer manufactured and is not being supported by the manufacturer.

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¹ Id., Paragraph 22.

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² Id., Paragraphs 42- 45.

21

22

³ Id.

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24 ⁴ The communities of Bethel, Chuathbaluk, Aniak, Kipnuk, Kotlik, Mountain Village,
25 Quinhagak, Savoonga, St. Mary’s, Toksook Bay, Tunanak, Alakanuk, Emmonak, Gambell, Chevak and
Hooper Bay are served under these licenses.

26

⁵ The community of Togiak is served under this license.

27

28

1 4. Unicom also has fourteen SCS-LIBRA analog cellular switches formerly manufactured
2 by NovAtel. These switches have been installed at all other locations served by Unicom.

3 5. In all locations, Unicom operates a single cell site. Based on this network configuration
4 there is no readily available technology for a network-based solution for E911. The only way to
5 provision E911 location information is through a handset-based approach.

6 6. At the present time, only the Police Department of the City of Bethel has installed 911
7 equipment at their offices which is capable of providing address information for traditional local loop.
8 The Police Department's 911 system is not capable of receiving location information from cellular
9 systems. The predecessor in interest to United-KUC, Inc., one of Unicom's affiliates, provided the
10 initial 911 equipment to the City of Bethel and supports that equipment. There appears to be no interest
11 at this time in upgrading the equipment to facilitate E911 service. There are no other public safety
12 agencies in Unicom's service area that have or will achieve Public Safety Answering Points ("PSAPs")
13 status at this time,⁶ although the City of Mountain Village has just requested that 911 calls be routed to
14 a dedicated telephone at the police station.

15 7. Unicom has sought to bring the benefits of wireless communications to remote
16 communities in Alaska. Based on the potentially low levels of subscribership this extension of service
17 has been undertaken with the use of older used analog cellular equipment which has been purchased at
18 a reduced price. In Unicom's judgment, the economic provision of wireless service can only be
19 attempted in this manner.

20 8. If Unicom would be required to replace all of this equipment with E911-compliant
21 equipment, it would need approximately one year to order, engineer, install, and test the new cellular
22 switching platforms. The costs for a new E911 compliant digital cellular switch in these location would
23 be in the range of \$800,000 to \$1,000,000 each.

24 9. Unicom currently has no independent business plan or reason to make these upgrades

25 _____
26 ⁶ Alaska Statutes 29.35.131 – .137 control the provision of 911 and E991 services by local
27 governments.

1 in the foreseeable future, and Unicom would have to devote all or a significant portion of its annual
2 revenues to such an upgrade program. If required to do so, E911 compliance would require Unicom to
3 make substantial expenditures that it otherwise would not make, and such expenditures would place a
4 severe strain on Unicom's limited financial resources. Compliance would exceed the financial viability
5 of Unicom as a cellular carrier and could likely result in a discontinuation of service to customers.
6 Discontinuation or curtailment of service to Unicom's cellular customers would result in a significant
7 degrading of public safety within Unicom's service areas. Unicom's cellular service has provided a vital
8 link for customers traveling in hostile weather conditions in some of the most remote areas of the
9 United States.

UNICOM, Inc.
5450 A Street
Anchorage,
Alaska 99518
907-561-1674

10
11 UNICOM HAS MET THE STANDARD FOR GRANT OF A WAIVER

12

13 10. Inasmuch as the only PSAP in Unicom's service area does not have plans to upgrade
14 their equipment to permit E911 location service, Unicom has not sought to urge consumers to acquire
15 handsets which permit GPS based location. Unicom submits that requiring the sale and utilization of
16 such handsets makes little practical sense when local law enforcement does not have the ability to make
17 use of location information.

18 11. Unicom is prepared to make and address the financial decisions which would be
19 required to upgrade Unicom's cellular systems to permit E911 location service at such time as local law
20 enforcement agencies determine it is in their best interests to undertake similar upgrades which would
21 permit E911 location services. The Commission's Rules as they pertain to Unicom's upgrades are
22 triggered at such time as a PSAP makes a request for E911 location services. Unicom believes that a
23 comparable approach and timetable should control the provisioning of location-capable handsets, that
24 is, at such time as a PSAP request is made, Unicom would either upgrade our equipment, exit the
25 cellular business or seek additional waivers. Unicom believes that this approach would make the most
26 sense for the customers that it services, under the circumstances under which service is provided.

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Wherefore, good cause shown, Unicom, Inc., requests that the requested waiver be granted.

Respectfully submitted,

UNICOM, INC.

Dated: _____

By: _____
Mark K. Johnson, Counsel

UNICOM, Inc.
5450 A Street
Anchorage,
Alaska 99518
907-561-1674

Before the
FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)
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Revision of the Commission’s Rules) **CC Docket No. 94-102**
To Enhance Compatibility With)
Enhanced 911 Emergency Calling)
System)

To: The Commission

Carrier Report Regarding
Implementation of Wireless E911 Phase II Automatic Location Identification

Unicom, Inc., (“Unicom”) hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification (“ALI”), in compliance with the Federal Communications Commission’s (“FCC” or “Commission”) *Further Memorandum Opinion and Order* in the above-captioned proceeding.

1 1. Background/Contact Information

2 Unicom serves portions of rural Alaska and its contact information is as follows:

3 Steve Hamlen
4 President
5 Unicom, Inc. TRS #801907
6 5450 A Street
7 Anchorage, Alaska 99518
8 telephone: 907-561-1674
9 fax: 907-563-3185

10 II. E911 Phase II Location Technology Information

11 If required, Unicom will chose to deploy a handset-based solution for its Phase II ALI technology.
12 Unicom is exploring the offerings of some handset vendors. Unicom would utilize the same technology,
13 once selected, throughout its service area, although, as noted below, that service area could shrink if
14 Unicom is required to purchase new switches.

15 III. Testing and Verification

16 Based on the circumstances, Unicom has not engaged in any testing of equipment.

17 IV. Implementation Details and Schedule

18 Unicom has viewed implementation as contingent upon receiving a request from a Public Safety
19 Answering Point (“PSAP”) for E911 information. At the present time, only the Police Department of
20 the City of Bethel has installed 911 equipment at their offices which is capable of providing address
21 information for traditional local loop. The Police Department’s 911 system is not capable of receiving
22 location information from cellular systems. The predecessor in interest to United-KUC, Inc., one of
23 Unicom’s affiliates, provided the initial 911 equipment to the City of Bethel and supports that
24 equipment. There appears to be no interest at this time in upgrading the equipment to facilitate wireless
25 E911 location service. There are no other public safety agencies in Unicom’s service area have or will
26 achieve Public Safety Answering Points (“PSAPs”) status at this time,⁷ although the City of Mountain
27 Village has just requested that 911 calls be fouted to a dedicated telephone at the police station.

28 Unicom is seeking a wavier of Section (1) of Paragraph (g) of 47 CFR 20.18 which requires that it begin
29 selling and activating location-capable handsets no later than October 1, 2001. Unicom does not believe
30 that it is practical or reasonable to require Unicom’s customers to purchase new handsets when the
31 public safety agencies in the service area have no current plans to upgrade their equipment and provide
32 E911 services.

33 As explained in Unicom’s waiver request, if required to do so, full E911 implementation would require
34 Unicom to make substantial expenditures that it otherwise would not make, and such expenditures

35 _____
36 ⁷ Alaska Statutes 29.35.131 – .137 control the provision of 911 and E991 services by local
37 governments.

1 would place a severe strain on Unicom's limited financial resources. Compliance would exceed the
2 financial viability of Unicom as a cellular carrier and could likely result in a discontinuation of service
3 to customers.

4 Additional decisions about Unicom's E911 schedule will depend upon the Commission's disposition
5 of Unicom's wavier request.

6 V. PSAP Interface

7 Unicom has not received any requests from a Public Safety Answering Point regarding E911 service.

8 VI. Existing Handsets

9 Unicom awaits the Commission's disposition of Unicom's waiver request as it pertains to handset
10 upgrades.

11 Respectfully submitted,
12 UNICOM, INC.

13 Dated: _____

14 By: _____
15 Mark K. Johnson, Counsel

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