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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)
)
Revision of the Commission's Rules to Ensure)
Compatibility with Enhanced 911 Emergency)
Calling Systems)
)
ALLTEL Communications, Inc.)
Petition for Waiver of Sections 20.18(e) and)
(g) of the Commission's Rules)

CC Docket No. 94-102 /

TRS No. 806258

To: The Commission

**SUPPLEMENT TO ALLTEL COMMUNICATIONS, INC.
PETITION FOR WAIVER OF SECTIONS 20.18(e) AND (g) OF
THE COMMISSION'S RULES**

ALLTEL Communications, Inc. ("ALLTEL"), on behalf of itself and its various subsidiaries and affiliates referenced in Appendix A hereto,¹ supplements its July 25, 2001 request seeking limited waiver of the Commission's rules governing the deployment of E-911 Phase II capabilities.² Although ALLTEL's waiver request substantially predates the deadline set in the Commission's recent Public Notice³ for the filing of waiver requests by small and mid-sized carriers, ALLTEL takes this opportunity to update the Commission on the status of its ongoing E-911 Phase I and Phase II

¹ Appendix A hereto is intended to supercede the original Appendix A attached to ALLTEL's July 25, 2001 waiver filing. The new Appendix A reflects the current ALLTEL licensees and affiliates in the wake of an internal corporate reorganization.

² ALLTEL also takes this opportunity to provide the Commission with a quarterly update and proposed by ALLTEL in its waiver request.

³ Public Notice, "Commission Establishes Schedule for E-911 Phase II Requests By Small and Mid-Sized Wireless Carriers", FCC 01-302 (released October 12, 2001) (the "Public Notice")

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List A B C D E

implementation efforts, and to make necessary minor adjustments to its proposed Phase II implementation schedule. These modifications, which have been occasioned by changes in equipment availability dates dictated by ALLTEL's vendors⁴, are consequently beyond ALLTEL's control and should result in only minor disruptions to ALLTEL's E-911 compliance roadmap.

1. Implementation Schedule

A. Network Elements.

Switch Upgrades. Based on information from ALLTEL's infrastructure vendors, the required software upgrades for their respective switches will become generally available *for testing* in the following timeframes:

VENDOR	GEN. AVAIL.
Motorola	2Q 2002
Lucent	November 9, 2001
Nortel	December 15, 2001

The general availability dates for the switch upgrades for the Motorola and Nortel switches remain as noted in ALLTEL's waiver filing. The general availability date for the switch upgrade for the Lucent switches was modified from the September date specified in ALLTEL's waiver filing to the November date specified above. The change should only marginally affect ALLTEL's switch upgrade implementation schedule. The switch upgrade implementation schedules for both Motorola (4Q 2002) and Nortel switches (2Q 2002) remain as stated in ALLTEL's waiver filing. For CDMA networks, Nortel is making the necessary switch modifications for E911 Phase II generally

⁴ ALLTEL remains in constant contact with each of its network and handset vendors.

available on December 15, 2001, but continues to reference the need to phase-in switch deployments among its various customers.⁵ Lucent has announced the general availability of the two (2) MSC features required to meet the FCC mandate for E911 Phase II on November 9, 2001.⁶ The change in the GA date for the Lucent switch upgrades was previously noted for the record.⁷

MCP/PDE. Lucent has modified the GA dates for its PDE/MPC. The GA date for the PDE is now December 31, 2001 and the GA date for the MPC is now February 1, 2002. As Lucent noted in its letter (Attachment C hereto), the FOA testing of the PDE with ALLTEL in Jacksonville was not fully completed due to technical issues requiring further resolution before the continuation of the FOA. Additional testing will be conducted with ALLTEL in Jacksonville, Florida. The MPC deployed will be fully J-STD-036 standard compliant and include support for the E₂-interface to enable NCAS Pull functionality. ALLTEL also continues to consider utilization of SnapTrack equipment in lieu of the Lucent PDE/MPC. ALLTEL currently believes that the improved Lucent MPC/PDE can be deployed after testing in the end of the 2Q 2002.

B. Handsets

ALLTEL has completed a detailed RFP process with numerous handset vendors. It has executed contracts for AGPS capable handsets with the vendors referenced in the table below. While the testing and general availability dates have been delayed by

⁵ Attachment B -- Nortel Letter.

⁶ Attachment C- Lucent Letter.

⁷ ALLTEL Comments, CC Docket No. 94-102 (Aug. 27, 2001) at 2. ALLTEL noted as well at page 2 of its Comments that carrier must be afforded some degree of latitude in deployment based upon vendor changes in GA dates, which are matters well beyond the carrier's control.

certain of the vendors, ALLTEL notes that Motorola has moved up its dates. ALLTEL believes that it will require no additional relief from the handset deployment thresholds beyond that sought in its original waiver filings.

Company	Test Units	Commercial	Chipset
Motorola (V120 – 5100)	April 2002	June 2002	5100
Nokia (3585)	4Q 2002	1Q 2003	Nokia
LG (TM520)	1Q 2002	3Q 2002	5100
Kyocera (K1.5)	Mar 2002	June 2002	5100
Audiovox (9155x)	Dec 2001	Feb 2002	5100

II. JACKSONVILLE TESTING

ALLTEL has conducted testing of a Lucent J-STD-036 standard compliant AGPS solution in its network in Jacksonville, Florida⁸ and successfully performed location of multiple test-calls in several environments.

As previously communicated to the Commission, the GA date for the needed network upgrades was revised.⁹ These changes also required an additional retrofit of the Jacksonville MSC in order to conduct the trial.¹⁰ The testing included participation of the local PSAP in Nassau County and required careful preparations in order to not disturb any regular 911-traffic. The trial network configuration also included ALLTEL's Technology Center (ATC) in Raleigh, NC where the Mobile Positioning Center (MPC) and the Position Determining Equipment (PDE) resided. IS-801 standard compliant Denso mobiles were used to conduct the accuracy testing. The trial included testing of both the MPC and PDE with the upgraded Lucent switch software loaded on the MSC as

⁸ ALLTEL Waiver Request, Docket No. 94-102, (July 25, 2001) at 20.

⁹ ALLTEL Comments, Docket No. 94-102, (Aug. 27, 2001) at 2.

¹⁰ *id.* (Attachment C).

well as end-to-end testing with the local PSAP. The trial ended on October 22, 2001 with the successful delivery of Phase II location data to the PSAP in Nassau County.

The scenarios used to verify the accuracy of AGPS technology were a subset of test conditions recommended by the CDMA Development Group.¹¹ The scenarios were chosen to reflect ALLTEL's coverage and locations where users would make emergency calls. The five environments were highway, rural, suburban, urban and dense urban.

As previously noted by ALLTEL, AGPS is a maturing technology. The trial results, while not definitive, indicated that additional testing was required for AGPS, AFLT, and Hybrid solutions. ALLTEL is currently conducting additional testing with Lucent in Jacksonville to address these issues. ALLTEL currently estimates that additional testing will conclude on or around December 17, 2001 in order to comport with the GA dates for the Lucent PDE/MPC noted above.

III. DEPLOYMENT PLAN

Based on the both the prior change in Lucent GA dates¹² and the extended trial activities, associated with the Lucent MPC/PDE ALLTEL is forced to request a minor modification to the deployment date for previously specified in its waiver for E-911 Phase II implementation in the markets served by its Lucent switches. Specifically, markets served by its Lucent switches will now be E-911 Phase II capable at the end of

¹¹ The CDMA Development Group (CDG) is a consortium of companies joined together to help ensure interoperability among different CDMA systems and aid in the development and testing of new capabilities or technologies. The CDG has been involved in activities to ensure that location technology is available to carriers in time to meet the FCC E911 location mandate, proposing system interface and handset standards requirements.

¹² ALLTEL Comments, Docket No. 94-102, (Aug. 27, 2001). *See also* Sprint PCS Further Supplemental Phase II Implementation Report, Sept. 20, 2001 at 4 where Sprint PCS reported a slip of Lucent installation schedule by at least two months due to the delay of Lucent switch software. *See also* Qwest Amended Waiver Request, Sept. 17, 2001 at 2 where Qwest asked for one quarter extension due to the delay of making the Lucent upgrades for Qwest Wireless MSC.

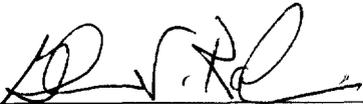
the 2Q 2002 as opposed to 1Q 2002, as proposed in the original waiver filing. Inasmuch as the technical issues respecting the Lucent MPC/PDE should be rectified and deployment of the MPC/PDE accomplished by 2Q2002, no modifications to the deployment dates for markets served by either Nortel or Motorola switches are anticipated at this time. Revised Phase II deployment schedules for each switch type are attached hereto as Appendix D.

IV. Phase I Status/PSAP Phase II Requests.

Updated spreadsheets detailing the status of ALLTEL's E-911 Phase I deployments and Phase II requests up to and including the month of November 2001 will be provided to the Commission shortly through an additional supplement once the information is tabulated.

Respectfully submitted

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By: 

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Federal Regulatory Affairs

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Dated: November 30, 2001

APPENDIX A

Appendix A
ALLTEL Licensees and Affiliates¹

¹ ALLTEL notes that it is in the process of filing notifications with the Commission of various pro forma assignments of license and transfers of control resulting from and internal reorganization. The instant waiver will be supplemented with a new Appendix A detailing once the notification process is complete.

LICENSEE MARKET

Sector Market Block

TRS Number

Alee Cellular Communications

NM RSA #3-Catron-Managed Only

A1

815324

ALLTEL Communications of Nebraska, Inc.

808638

Lincoln, NE

B1

NE RSA #1- Sioux

B1

NE RSA #10 - Cass

B1

NE RSA #2 - Cherry

B1

NE RSA #3 - Knox

B1

NE RSA #4 - Grant

B1

NE RSA #5 - Boone

B1

NE RSA #6 - Keith

B1

NE RSA #7 - Hall

B1

NE RSA #8 - Chase

B1

NE RSA #9 - Adams

B1

Omaha, NA/IA

B1

<i>LICENSEE MARKET</i>	<i>Sector</i>	<i>Market Block</i>	<i>TRS Number</i>
<i>ALLTEL Alabama Limited Partnership</i>			
<i>(d/b/a name change formerly ALLTEL Illinois Limited Partnership)</i>			
Mobile, AL		B1	
<i>ALLTEL Cellular Associates of Arkansas Limited Partnership</i>			
Little Rock-North Little Rock, AR		B1	806175
<i>ALLTEL Central Arkansas Cellular Limited Partnership</i>			
AR RSA #10-Garland		B1	
AR RSA #4-Clay		B1	
AR RSA #5-Cross		B1	
AR RSA #6-Cleburne		B1	
AR RSA #7-Pope		B1	
<i>ALLTEL Communications, Inc</i>			
AL RSA #4-Bibb		B1	
AL RSA #5 (B-2)-Cleburne		B2	
AL RSA #6-Washington		B1	
AL RSA #7-Butler		B1	
AL RSA #8-Lee		B1	
Albany, GA		B1	
AR RSA #2 (B-2) - Marion		B2	
AR RSA #9-Polk	East	B1	
AR RSA #9-Polk	West	B1	
			806258

<i>LICENSEE MARKET</i>	<i>Sector</i>	<i>Market Block</i>	<i>TRS Number</i>
Arkansas Paging			
Augusta, SC/GA		B1	
Charlotte-Gastonia-Rock Hill, NC		B1	
Charleston, WV		B1	
CO RSA #6-San Miguel		A1	
Columbia, SC		B1	
Dothan, AL (PAN)		B1	
FL RSA #4 (B-3)-Citrus		B3	
FL RSA #5 (B-2)-Putnam		B2	
FL RSA #6-Dixie		B1	
FL RSA #7-Hamilton		B1	
FL RSA #8 (B-1)- Jefferson		B1	
FL RSA #8 (B-2)-Jefferson		B2	
FL RSA #9 - Calhoun		B1	
FL RSA #10 - Walton		B1	
Florence, SC		B1	
Florida Paging			
Fort Smith, AR/OK		B1	
Fort Walton Beach, FL		B1	
GA RSA #10 (B-1)-Bleckley		B1	
GA RSA #10 (B-2)-Bleckley		B2	
GA RSA #11 - Toombs		B1	
GA RSA #13-Early		B1	
GA RSA #7 (B-2)-Hancock	East	B2	
GA RSA #7 (B-2)-Hancock	West	B2	
GA RSA #9 (B-2) - Marion		B2	
GA RSA #9 (B-3)-Marion		B3	
GA RSA #14 - Worth		B1	
Gainesville, FL		B1	
Hickory, NC		B1	
Huntington-Ashton, WV/KY/OH		B1	
Jacksonville, NC		B1	
Jacksonville, FL		PCS	
Johnson City-Kingsport-Bristol, TN/VA		B1	
Mansfield, OH		B1	

MO RSA #10 - Benton		B1
MO RSA #16 - Laclede		B1
MO RSA #3 - Schuyler		B1
MO RSA #9 (B-2) - Bates		B2
Montgomery, AL		B1
NC RSA #2 (B-2) Yancey		B2
NC RSA #4 (B-3)-Henderson		B3
NC RSA #5 (B-2)		B2
NC RSA #6 - Chatman	Southern Pines	B1
NC RSA #6 - Chatman	Lumberton	B1
NC RSA #7 (B-1) - Rockingham		B1
NC RSA #7 (B-2) - Rockingham		B2
NC RSA #8 - Northhampton		B1
NC RSA #9 - Camden		B1
NC RSA #10 - Harnet		B1
NC RSA #11 - Hoke	North	B1
NC RSA #11 - Hoke	South	B1
NC RSA #12 - Sampson		B1
NC RSA #13 - Greene		B1
NC RSA #14 - Pitt		B1
NC RSA #15 (B-1) - Cabarrus	East	B1
NC RSA #15 (B-1) - Cabarrus	West	B1
Newport News, VA		B1
Norfolk, VA/NC		B1
Ocala, FL		B1
OH RSA #11 - Columbiana		B1
Panama City, FL		B1
Parkerburg-Marrietta, WV/OH		B1

<i>LICENSEE MARKET</i>	<i>Sector</i>	<i>Market Block</i>	<i>TRS Number</i>
Savannah, GA		B1	
SC RSA #1 - Oconee		B1	
Springfield, MO		B1	
Steubenville-Weirton, OH/WV		B1	
Tallahassee, FL		B1	
TN RSA #4 - Hambleton		B1	
TN RSA #8 - Johnson		B1	
TX RSA #15 (B-1) - Concho		B1	
Wheeling, WV/OH		B1	
Wilmington, NC		B1	
<i>ALLTEL Communications of the Southwest Limited Partnership</i>			<i>818428</i>
Albuquerque, NM		A1	
AZ RSA #2 - Conconino		A1	
AZ RSA #5 - Gila		A1	
El Paso, TX		A1	
Phoenix, AZ		A1	
Tucson, AZ		A1	
<i>ALLTEL Communications of Virginia, Inc.</i>		B1	<i>818380</i>
Charlottesville, VA		B1	
<i>ALLTEL Communications of Virginia, No.1, Inc.</i>			
Danville, VA		B1	
Lynchburg, VA		B1	
VA RSA #1 - Lee		B1	
VA RSA #4 (B-2) - Bedford		B2	
VA RSA #6 (B-2) - Highland		B2	
VA RSA #7 (B-2) - Buckingham		B2	
VA RSA #8 (A-1) - Amelia		A1	
VA RSA #9 (A-1) - Greenville	East	A1	
VA RSA #9 (A-1) - Greenville	West	A1	
VA RSA #11 (B-2) - Madison		B-2	
<i>ALLTEL Communications of New Mexico, Inc.</i>			<i>818494</i>
NM RSA #1 - San Juan	Southeast	A1	

ALLTEL Communications of Ohio No.3, Inc.

Ohio RSA #11	Columbiana	B1
Ohio RSA#1 - Williams		B1
OH RSA #7 (B-2) - Tuscarawas		B2
OH RSA #10 (B-2) - Perry		
NM RSA #1 - San Juan	Northwest	A1
NM RSA #2 - Colfax		A1
NM RSA #4 - Sante Fe		A1
NM RSA #5 - Grant		A1
WV RSA #6 - Lincoln		B1

ALLTEL Communications of North Carolina Limited Partnership 818374

Greensboro-Winston Salem-High Point, NC	B1
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ALLTEL Communications of Texas Limited Partnership 818378

Killeen - Temple, TX (KTW)	B1
TX RSA #9 (B-3) - Runnels	
TX RSA #10 (B-2) - Navarro	B2
TX RSA #10 (B-4) - Navarro	B4
Waco, TX (KTW)	B1

ALLTEL Missouri RSA #14 Limited Partnership 806235

MO RSA #14 - Barton	B1
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ALLTEL Northern Arkansas RSA Limited Partnership 806205

AR RSA #1 (B-2) - Madison	B2
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ALLTEL Ohio Limited Partnership 807597

(d/b/a name change formerly GTE MoblieNet of Ohio Limited Partnership)

Akron, OH	B1
Canton, OH	B1
Cleveland, OH	B1
Lorain-Elyria, OH	B1

ALLTEL Wireless Holdings, LLC New Entity

Bradenton, FL	B1
FL RSA #11-Monroe	B2
FL RSA #2-Glades	B1
FL RSA #2-Glades	B1
FL RSA #3-Hardee	B1

FL RSA #3-Hardee		B1
FL RSA #4-Citrus		B1
Fort Myers, FL		B1
Lakeland-Winter Haven, FL		B1
Pensacola, FL		B1
Sarasota, FL		B1
Tampa Bay-Clearwater-St Petersburg, FL	Tampa	B1

<i>LICENSEE MARKET</i>	<i>Sector</i>	<i>Market Block</i>	<i>TRS Number</i>
Tampa Bay-Clearwater-St Petersburg, FL.	St. Petersburg-Clearwater	B1	
<i>Arkansas RSA #2 (Searcy County) Cellular Limited Partnership</i>			818074
Arkansas 2		B1	
<i>Charleston/North Charleston MSA Limited Partnership</i>			818424
Charleston-North Charleston, SC		B1	
<i>Etex Cellular Company, Inc. (AT manages only)</i>			818360
Texas 7B4		B1	
<i>Fayetteville MSA Limited Partnership</i>			806222
Fayetteville-Springdale, AR		B1	
<i>Georgia RSA #12 Partnership</i>			806214
GA RSA #12 - Liberty		B1	
<i>Georgia RSA #8 Partnership</i>			806211
GA RSA #8-Warren	South	B1	
GA RSA #8-Warren	North	B1	

<i>LICENSEE MARKET</i>	<i>Sector</i>	<i>Market Block</i>	<i>TRS Number</i>
<i>Las Cruces Cellular Telephone Company</i> Las Cruces, NM		B1	820115
<i>Liberty Cellular, Inc.</i>			802968
KS RSA #1-Cheyenne		B1	
KS RSA #10-Franklin		B1	
KS RSA #11-Hamilton		B1	
KS RSA #12-Hodgeman		B1	
KS RSA #13-Edwards		B1	
KS RSA #14-Reno		B1	
KS RSA #15 (A-1)-Elk		A1	
KS RSA #2-Norton		B1	
KS RSA #3-Jewell		B1	
KS RSA #4-Marshall		B1	
KS RSA #5 (B-1)-Brown		B1	
KS RSA #6-Wallace		B1	
KS RSA #7-Trego		B1	
KS RSA #8-Ellsworth		B1	
KS RSA #9-Morris		B1	
<i>Missouri RSA #15 Limited Partnership</i> MO RSA #15 - Stone		B1	806238
<i>Missouri RSA #2 Partnership</i> MO RSA #2 - Harrison		B1	806226
<i>Missouri RSA 4 Partnership</i> MO RSA #4 - De Kalb		B1	806232
<i>New York NewCo Subsidiary, Inc.</i>			
Anderson, SC		B1	
FL RSA #1 - Collier		B1	
Greenville - Spartanburg, SC		B1	
OH RSA #2B2 - Sandusky		B1	

<i>LICENSEE MARKET</i>	<i>Sector</i>	<i>Market Block</i>	<i>TRS Number</i>
<i>North Carolina RSA #15 Cellular Partnership</i>			806247
NC RSA #15 (B-2)-Cabarrus		B2	
<i>North Carolina RSA #5 Cellular Partnership</i>			806244
NC RSA #4 (B-2)-Henderson		B2	
NC RSA #5 (B-1)-Anson		B1	
<i>Northwest Arkansas RSA Limited Partnership</i>			806254
AR RSA #1 (B-1) - Madison		B1	
AR RSA #8 - Franklin		B1	
<i>Ohio RSA #3 Limited Partnership</i>			807579
OH RSA #3-Ashtabula		B1	
<i>Ohio RSA 2 Limited Partnership</i>			818484
OH RSA #2-Sandusky		B1	
<i>Ohio RSA 5 Limited Partnership</i>			818486
OH RSA #5-Hancock		B1	

LICENSEE MARKET	Sector	Market Block	TRS Number
<i>Ohio RSA 6 Limited Partnership</i>			818488
OH RSA #6-Morrow		B1	
<i>Oklahoma RSA No. 4 South Limited Partnership</i>			806227
OK RSA #4 (B-3) - Nowata		B3	
<i>Pennsylvania RSA No. 6(1) Limited Partnership</i>			818474
PA RSA #6 (B-1)-Lawrence		B1	
<i>Petersburg Cellular Partnership</i>			818432
Petersburg-Colonial Heights-Hopewell, VA		A1	
<i>Radiofone, Inc /dba ALLTEL Communications, Inc</i>			
Baton Rouge, LA (A-1)		A1	
LA RSA #6 (A-2) - Iberville		A2	
LA RSA #8(A-1) - St. James		A1	
LA RSA #9(A-1) - Plaquemines		A1	
New Orleans, LA (A-1)		A1	
<i>Raleigh / Durham MSA Limited Partnership</i>			818404
Fayetteville, NC		B1	
Burlington, NC		B1	
Raleigh-Durham, NC		B1	
<i>RCTC Wholesale Corporation</i>			818370
Richmond, VA		A1	
<i>South Carolina RSA #3 Cellular General Partnership</i>			806250
SC RSA #3-Cherokee		B1	
<i>South Carolina RSA #7 Cellular General Partnership</i>			806253
SC RSA #7-Calhoun		B1	
<i>South Carolina RSA #9 Cellular General Partnership</i>			806256

LICENSEE MARKET	Sector	Market Block	TRS Number
SC RSA #9-Lancaster		B1	
<i>South Carolina RSA No. 2 Cellular General Partnership</i>			<i>818464</i>
SC RSA #2-Laurens		B1	
<i>South Carolina RSA No. 4 Cellular General Partnership</i>			<i>818362</i>
SC RSA #4-Chesterfield		B1	
<i>South Carolina RSA No. 5 Cellular General Partnership</i>			<i>818364</i>
SC RSA #5-Georgetown		B1	
<i>South Carolina RSA No. 6 Cellular General Partnership</i>			<i>818366</i>
SC RSA #6-Clarendon		B1	
<i>South Carolina RSA No. 8 Cellular General Partnership</i>			<i>818468</i>
SC RSA #8-Hampton		B1	

<i>LICENSEE MARKET</i>	<i>Sector</i>	<i>Market Block</i>	<i>TRS Number</i>
<i>Texas RSA 11B Limited Partnership</i>			<i>818450</i>
TX RSA #11 (B-2)-Cherokee		B2	
<i>Texas RSA 7B2 Limited Partnership</i>			<i>818442</i>
TX RSA #7 (B-2)-Fannan		B2	
<i>Toledo MSA Limited Partnership</i>			<i>818394</i>
Lima, OH		B1	
Toledo, OH/MI		B1	
<i>Tucson 21 Cellular Limited Partnership</i>			<i>820117</i>
Tucson 21, AZ		A2	
<i>Tyler/Longview/Marshall MSA Limited Partnership</i>			<i>818402</i>
Longview-Marshall, TX (LTM)		B1	
Tyler, TX (LTM)		B1	
<i>Virginia RSA 2 Limited Partnership</i>			<i>818492</i>

<i>LICENSEE MARKET</i>	<i>Sector</i>	<i>Market Block</i>	<i>TRS Number</i>
VA RSA #2-Tazewell		B1	
<i>Wilkes Cellular (Switch Only)</i>			806702
GA RSA #4 (B-2) - Jasper		B2	
<i>Youngstown / Warren MSA Limited Partnership</i>			818398
Youngstown, OH		B1	

APPENDIX B

Notice to Nortel Network Wireless Customers, Seeking or in Receipt of FCC Waivers E991 Phase II Compliance November 20th, 2001

This Notice is directed to both Nortel Networks Mid-Sized and Small Wireless Network Customers that may file FCC Waiver requests by November 30, 2001, pursuant to the FCC Notice dated 10-12-01, and to other Carriers that may have parts of their networks affected by this Notice.

On 10-12-01 the FCC issued a Public Notice (FCC 01-302) directing Small and Mid-Sized Carriers to file Waiver requests by November 30, 2001, if they cannot otherwise comply with FCC E-911 PII rules. Additional future guidance for filing Waivers referenced in the 10-12-01 Notice was released 10-19-01. The FCC's guidance for the content of a waiver request (Notice dated 10-19-01, DA 01-2459) included guidance to be: "specific, focused and limited in scope"; "a clear path to full compliance"; and have "concrete steps necessary to come as close as possible to full compliance and should document their efforts aimed at compliance." Further, "The carrier should provide a full explanation and justification for the relief requested including all aspects of the Phase II rules from which relief is sought and the exact nature of this relief." Approved Waivers contained specific equipment milestones, including some network improvement deadline dates. Nortel Networks anticipates our wireless customers may believe it necessary to propose specific Nortel Network equipment up-grades, by specific dates, to satisfy the FCC requirements for a detailed waiver request.

Nortel Networks has provided specific information on its equipment solutions for PII E-911, and that information is as follows:

- Limited general availability for E-OTD solutions for GSM systems will be available by July 1, 2002. However, as Nortel Networks will give priority to customers who have already placed orders for the solutions, new orders may not be served until after September 2002.
- For customers with TDMA and CDMA networks Nortel Networks makes available the necessary switch modifications (J-STD-036) for the Location Center in MTX 10. MTX 10 is Generally Available December 15, 2001. With J-STD-036, customers can host Location Solutions from several vendors, on their Nortel Networks CDMA or TDMA networks. Nortel Network's does not plan to offer a Location Center (MPC/PDE) product.

As Nortel Networks advised the FCC in Ex Parte communication, letter dated September 26, 2000 (attached Exhibit A), General Availability (GA) does not imply that Nortel Networks can deliver and installation (where requested) solutions to all customers by the specified GA dates. Equipment rollout to customers will be through a managed ramp starting at a referenced GA date. In this context, Nortel Networks will schedule

equipment volume rollout, and deployment services, prioritized by receipt of customer orders.

In summary, Nortel Networks is prepared to commit to specific plan dates within a customer's waiver submission to the FCC after a signed a Purchase Order has been received and, if applicable, engineering support services agreed with the customer.

Nortel Networks

Mark Whitfill
Account Manager

APPENDIX C

Lucent Technologies
Bell Labs Innovations



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November 28, 2001

Mr. Bjorn Hjelm
Engineer III, Network Planning
ALLTEL Communications
One Allied Drive
Little Rock, AR 72202

Dear Mr. Hjelm,

As you have requested, I am pleased to provide this update on Lucent Technologies' E911 Phase II network development. Lucent is highly committed to providing our customers with the network components needed to achieve E911 Phase II compliance. We are pleased to announce that we have made significant progress in the development of a comprehensive E911 solution.

Lucent's E911 Phase II First Office Application ("FOA") trials began on October 8, 2001 and it included testing of four network software features needed to address the FCC mandate for E911 Phase II. On November 9, 2001, Lucent successfully completed the development and testing of the first two features, **FID 3581.0: E911 Phase II compliance (j-std-036)** and **FID 3581.1: CDMA Enhancements for E911 Phase II**.

We are continuing FOA testing on two remaining features, **FID 3581.2: CDMA Enhancements for E911 Phase II (includes enhancements to One Way Delay 2 parameter)** and **FID 4403.0: Flexent Position Determination Equipment (PDE)**. These are, respectively, a network enhancement and a PDE feature.

The FOA will be continued with a new cell and PDE load. The new target GA date for these features is December 31, 2001.

In addition to the Position Determination Equipment, operators will need to have a Mobile Positioning Center (MPC). The projected FOA date for the Lucent MPC Release 4.0 is January 7, 2002 with an anticipated general availability (GA) date of February 1, 2002.

Lucent recognizes that E911 Phase II is a vital service for wireless subscribers, and we are committed to providing the appropriate network and PDE compliance features in the most expeditious manner possible.

We look forward to continued collaboration with Alltel as we proceed with First Office Application testing.

Sincerely,



Michael Iandolo
TDMA/CDMA Product Management VP

cc: M. Chan

APPENDIX D

E911 Phase II Deployment for Motorola MSC

ID	Task Name	Start	Finish	Description
1	Testing of Motorola MSC release 16.1 in ALLTEL Lab.	02/11/02	05/03/02	Testing of the software release would include the E-911 feature.
2	ALLTEL FOA market for Motorola MSC release 16.1	05/03/02	06/06/02	
3	Cell calibration of markets where request has been made	04/23/02	06/15/02	The duration of the cell calibration will depend on the number of cell site affected by PSAP Phase II requests received at that time.
4	ALLTEL Deployment of MSC release 16.1	06/15/02	11/09/02	This date will be dependent on the actual Motorola GA of this release. Based on the PSAP Phase II request received as of the day of this filing, the Motorola switches that are affected would be upgraded the first month.
5	Testing and verification of the E-911 feature in Motorola markets before activation	06/15/02	11/09/02	An additional 30 days of testing would be required for every Phase II request received at that time before activating the feature on the switch.

E911 Phase II Deployment for Nortel MSC

ID	Task Name	Start	Finish	Description
1	ALLTEL First FOA market for Nortel MSC release MTX10	02/22/02	03/15/02	The trial will be conducted in Kansas at would satisfy existsting PSAP Phase II request involving a Nortel switch. An additional 30 days would be required for Phase II testing and cell calibration before activating the feature on
3	Cell calibration of markets where request has been made	02/15/02	03/15/02	The duration of the cell calibration will depend on the number of cell site affected by PSAP Phase II requests received at that time.
4	Testing and verification of the E-911 feature in the first Nortel markets with MPC/PDE before activation	03/18/02	04/12/02	An additional 30 days of testing would be required for every Phase II request received at that time before activating the feature on the switch.

E911 Phase II Deployment for Lucent MSC

ID	Task Name	Start	Finish	Description
1	ALLTEL First FOA market for Lucent MSC release ECP17.1	09/27/01	11/05/01	The trial will be conducted in Jacksonville as part of the MPC and PDE testing.
2	Cell calibration of markets where request has been made	03/15/02	04/12/02	The duration of the cell calibration will depend on the number of cell site affected by PSAP Phase II requests received at that time.
3	Testing and verification of the E-911 feature in the first Lucent markets with MPC/PDE before activation	04/15/02	05/12/02	An additional 30 days of testing would be required for every Phase II request received at that time before activating the feature on the switch.

E911 Phase II Deployment for Lucent MSC

ID	Task Name	Start	Finish	Description
1	Deployment of PDE and MPC	01/04/02	04/04/02	This will be done by the supplier and includes installtion and testing before transferring the ownership to ALLTEL. The general time for deploying this kind of equipment is between 8 and 12 weeks.
2	Oder SS7 links for PDE and MPC	01/14/02	01/15/02	Links will be ordered from each of the host STPs to the PDE and MPC.
3	Install and test SS7 links	02/27/02	03/06/02	Certify that the SS7 links meet SS7 standards for reliability.
4	Perform level 2 and 3 SS7 Certification	04/05/02	04/11/02	Certify that the PDE and MPC will perform properly in an SS7 environment.
5	Perform protocol analysis on the test messages to and from the PDE and MPC	04/12/02	04/12/02	A variety of call types will be tested to ensure that the PDE and MPC will perform properly.