

**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: The Commission

**Quarterly Report of Kentucky RSA 3, Kentucky RSA 4 Cellular General Partnership, and
Cumberland Cellular Partnership d/b/a Bluegrass Cellular Inc.
Regarding TTY Access to Digital Wireless Systems**

Kentucky RSA 3, Kentucky RSA 4 Cellular General Partnership, and Cumberland Cellular Partnership d/b/a Bluegrass Cellular Inc. ("Bluegrass") hereby reports on its implementation of text telephone ("TTY") access to digital wireless systems, in compliance with the Federal Communications Commission's ("FCC" or "Commission") Fourth Report and Order in the above-captioned proceeding.¹

Since Bluegrass filed its third quarter report, Bluegrass has continued to follow-up with its network vendor, Nortel, regarding a digital TTY solution. Bluegrass's digital TTY implementation efforts are dependent upon its switch manufacturer, Nortel, and the commercial availability of the Nortel TTY solution. Nortel has revised the estimated availability date of its software release, and now informs Bluegrass that it will have a digital TTY solution available to Bluegrass late first quarter or early second quarter 2002 in software release MTX10. However, Nortel cautions that this is not a firm schedule. Bluegrass will make the necessary changes to its processor/hardware when Nortel delivers and loads its product.

Bluegrass remains committed to make every effort to implement digital TTY capability in its entire market by the June 30, 2002 deadline. However, because Bluegrass does not anticipate that it will meet the December 31, 2001 deadline established by the FCC's Fourth Report and Order for obtaining all software upgrades and equipment necessary to make its system capable of transmitting 911 calls from TTY devices, Bluegrass requests a waiver of this requirement to the extent necessary.²

Date: December 21, 2001

¹ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Fourth Report and Order, CC Docket No. 94-102 (released December 14, 2000).

² The instant report is filed prior to January 15, 2002 in order to accommodate the instant waiver request.