Law Offices
HOLLAND & KNIGHT LLP

2099 Pennsylvania Avenue, N.W.
Suite 100
Washington, D.C. 20006-6801

202-955-3000
FAX 202-955-5564
www.hklaw.com

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January 17, 2002

PETER M. CONNOLLY
202-862-5989

Internet Address:
pconnoll@hklaw.com

Via Electronic Filing

Magalie Roman Salas
Secretary
Federal Communications Commission
445 – 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

RE: *United States Cellular Corporation*
Quarterly TTY/Digital Deployment Status Report – CC Docket No. 94-102

Dear Ms. Salas:

Transmitted herewith, on behalf of United States Cellular Corporation and its various subsidiaries and affiliates providing digital CMRS services, is its fourth quarterly report on the status of its efforts to implement TTY compatibility pursuant to the requirements set forth in the Fourth Report and Order[1].

In the event there are any questions concerning this report, please contact the undersigned at (202)862-5989.

Very truly yours,

Peter M. Connolly
Legal Counsel for United States
Cellular Corporation

Attachment

WAS1 #1049880 v1

[1] In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Calling Systems, Fourth Report and Order, CC Docket No. 94-102, FCC 00-436 (released December 14, 2000) ("Fourth Report and Order").

US Cellular 4th Quarter 2001 Report

1. *Network infrastructure software development*
   US Cellular deploys CDMA using Nortel and Lucent platforms and deploys TDMA using the Nortel Platform. US Cellular relies on Nortel and Lucent to provide the software development and upgrades. Both Lucent and Nortel have generally available software loads with TTY capabilities.

   TDMA

   Nortel development and product testing conforms to TIA/EIA 136-410 (EFRC Codec). The TTY capability is incorporated into the Nortel MTX10 software load.

   CDMA

   Nortel development and product testing conforms to IS-127-2 (EVRC) and IS-733-1 (13K vocoder) Nortel plans on supporting IS-127-3 and IS-733-2 at a later date. Initial implementation will be meet IS-127-2 and IS-733-1.

   Lucent release 17 will support the latest standards.

2. *Handset and development and testing plans*
   US Cellular is relying on the handset vendors for the development of any product. When terminal units are available, US Cellular will perform field-testing in accordance with the Loeber and Walsh test plan, previously submitted in the TTY Forum.

3. *Beta testing and lab testing*
   US Cellular is only able to field-test beta units. Testing of beta units will only take place after the final release of the infrastructure is in place. Presently, there are no beta units available. In addition, US Cellular relies on the handset vendors to perform beta and lab testing.

4. *Release and general availability to carriers of network software*
   US Cellular has commitments from Lucent (CDMA) that release 17 will be available during November 2001.

   Nortel (CDMA) has forwarded the following to US Cellular:

Software load	**CDMA SW general availability**
MTX09	Now available
NBSS10.1 with MTX09	October 12, 2001
MTX10	December 7, 2001

   Nortel (TDMA) has forwarded the following to US Cellular:

Software load	**TDMA SW general availability**
MTX09	Today
MTX10 TDMA	November 30, 2001

5. *Availability to carriers of full acceptance test units*
   US Cellular is awaiting a firm commitment from its handset suppliers for the availability of full acceptance test units.

US Cellular 4th Quarter 2001 Report

6. *Efforts towards achieving digital wireless solution compatibility with enhanced TTY devices.*
   US Cellular will work with the various manufacturers to achieve a standard to transport enhanced TTY devices (proprietary faster turbo codes). Our infrastructure vendors are not supporting enhanced protocols at this time.

7. *Carrier coordination of testing with PSAP*
   US Cellular will conduct TTY testing with larger PSAPs in its coverage area and with any PSAP that requests testing. No requests have been received. Scheduling of these tests will commence after acceptable handsets and infrastructure equipment is in place.

8. *Carrier testing activities, including field testing, consumer end-to-end testing*
   Scheduling of consumer end-to-end testing will commence after acceptable handsets and infrastructure equipment is in place.

9. *Retail availability of necessary consumer equipment*
   There are TDMA and CDMA handsets available that will pass TTY Baudot tones.

10. *Geographic scope of network deployment*
    US Cellular is planning on having the “Network” portion of the TTY solution installed in all our CDMA and TDMA markets throughout the country. Deployment will initially be deployed on a limited basis to insure that the network integrity is not compromised.

    Rollout of a new software load is a lengthy process. Since software releases often change the billing format, upon initial release of the software, USCC must request sample billing data from Nortel and Lucent and validate that these changes have not diminished USCC's capacity to produce an accurate bill. Frequently, USCC must modify its internal billing software in order to accommodate changes made by Nortel and Lucent to the billing format in the new software load. This requires a minimum of ninety days. Only then can USCC begin upgrades to its switching network, beginning with one switch.

    In full production, USCC can accommodate upgrades to two switches per week. Hardware upgrades are usually required with each software upgrade. Nortel requires a 28 day "soak" period from the time of hardware installation before the software upgrade can be run. In addition, CDMA systems are more complex given that software and hardware upgrades are required for two network elements, both the Mobile Switching Center (MSC) and the Base Station Controller (BSC). All CDMA locations require an additional 4 weeks to deploy the software upgrade.

    US Cellular has a tentative schedule for software upgrades at ten switch locations throughout April 2002. The tentative in-service dates for the ten locations will be in May or June depending on whether the location is AMPS/TDMA or CDMA. The remaining switch locations will be scheduled for the upgrades in the coming months.

    By way of example, USCC completed the MTX09 upgrade, which began in February, 2001, by the end of October, 2001. This upgrade was considered a "light load," as it did not require significant hardware upgrades. USCC has 50 plus switches to upgrade. In USCC's experience, the upgrade procedure is not unique to Nortel but is relatively standard throughout the industry.