

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Revision of the Commission's Rules)
to Ensure Compatibility with Enhanced)
911 Emergency Calling Systems)

CC Docket No. 94-102

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Wireless Telecommunications Bureau

**Supplement to Report on Implementation of Wireless E911 Phase II
and Second Amendment to Petition for Waiver of
Cal-One Cellular, L.P.**

Cal-One Cellular, L.P. ("Cal-One"), by its attorneys and pursuant to Section 20.18(i) of the rules and regulations of the Federal Communications Commission ("Commission"),¹ and the Commission's public notices,² hereby submits a supplement to its E911 Phase II Report³ and to its Petition for Waiver in the above captioned proceeding.

I. Supplement to Report on Implementation of Wireless E911 Phase II

Cal-One hereby supplements its Phase II Report as follows. First, please revise Paragraph No. 2, styled as "Contact Information," as set forth below.

¹47 C.F.R. §20.18(i).

²"Commission Establishes Schedule for E911 Phase II Requests by Small and Mid-Sized Wireless Carriers, CC Docket No. 94-102," *Public Notice*, FCC 01-302, rel. Oct. 12, 2001 ("*October 12 Public Notice*"); and "Wireless Telecommunications Bureau Provides Guidance on Filings By Small and Mid-Sized Carriers Seeking Relief From Wireless E911 Phase II Automatic Location Identification Rules, CC Docket No. 94-102," *Public Notice*, DA 01-2459, rel. Oct. 19, 2001 ("*October 19 Public Notice*").

³CC Docket No. 94-102 Report on Implementation of Wireless E911 Phase II Automatic Location Identification, Cal-One Cellular, L.P., "Report on Implementation of Wireless E911 Phase II ANI," filed Nov. 6, 2000.

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Further, please amend the following to the information already contained in Paragraph No. 7, styled as "Other Information," to add the supplemental information set forth below.

The State of California has decided to bypass Phase I Automatic Number Identification ("ANI") entirely in favor of proceeding directly to Phase II Automatic Location Identification ("ALI"). Cal-One has received no PSAP requests for Phase II

ALI; according to the draft plan circulated by the State of California, and attached hereto as Exhibit I, Cal-One will not receive any requests for its area until 2004/2005.

II. Second Amendment to Petition for Waiver of Cal-One Cellular, L.P.

On September 19, 2001, Cal-One filed a Petition for Limited Waiver of Section 20.18 of the Commission's rules,⁴ and on November 5, 2001, Cal-One filed an Amendment to Petition for Waiver and Supplemental E911 Phase II Report ("November 5 Supplement").⁵ As presented in more detail in Section I above, and in Exhibit I attached hereto, California's plan to begin providing E911 Phase II service in Cal-One's territory in 2004/2005 provides further evidence that Cal-One's proposed implementation schedule contained its November 5 Supplement would serve the public interest without prejudicing PSAPs. Assuming that affordable ALI-capable handsets are commercially available in sufficient quantities, Cal-One plans to discontinue selling non-ALI-capable handsets by the end of 2005, when California plans to make its PSAPs ready and to roll-out E911 in Cal-One's territory.

The foregoing, along with the information contained in the September 19 Petition and November 5 Supplement, satisfies both the general requirements to waive a Commission rule as well as the more detailed standards contained in the Commission's E911 *Fourth Memorandum Opinion*

⁴Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, DA 98-2631, Cal-One Cellular, L.P. Petition for Limited Waiver of Section 20.18(g) of the Commission's Rules, filed September 19, 2001 ("*September 19 Petition*").

⁵The November 5 Supplement revised Cal-One's plans based upon the October 12, 2001 Commission rulings on five nationwide carriers' similar requests for waiver of the Commission's enhanced 911 Phase II implementation plans which set mandatory conditions, and gave small and mid-sized carriers until November 30, 2001 to file requests for waiver of E911 Phase II implementation requirements or to supplement or revise pending requests for waiver (*October 12 Public Notice*).

and Order,⁶ and the *October 19 Public Notice*. Accordingly, there is good cause to grant the limited waiver requested herein.

Respectfully submitted,

CAL-ONE CELLULAR, L.P.

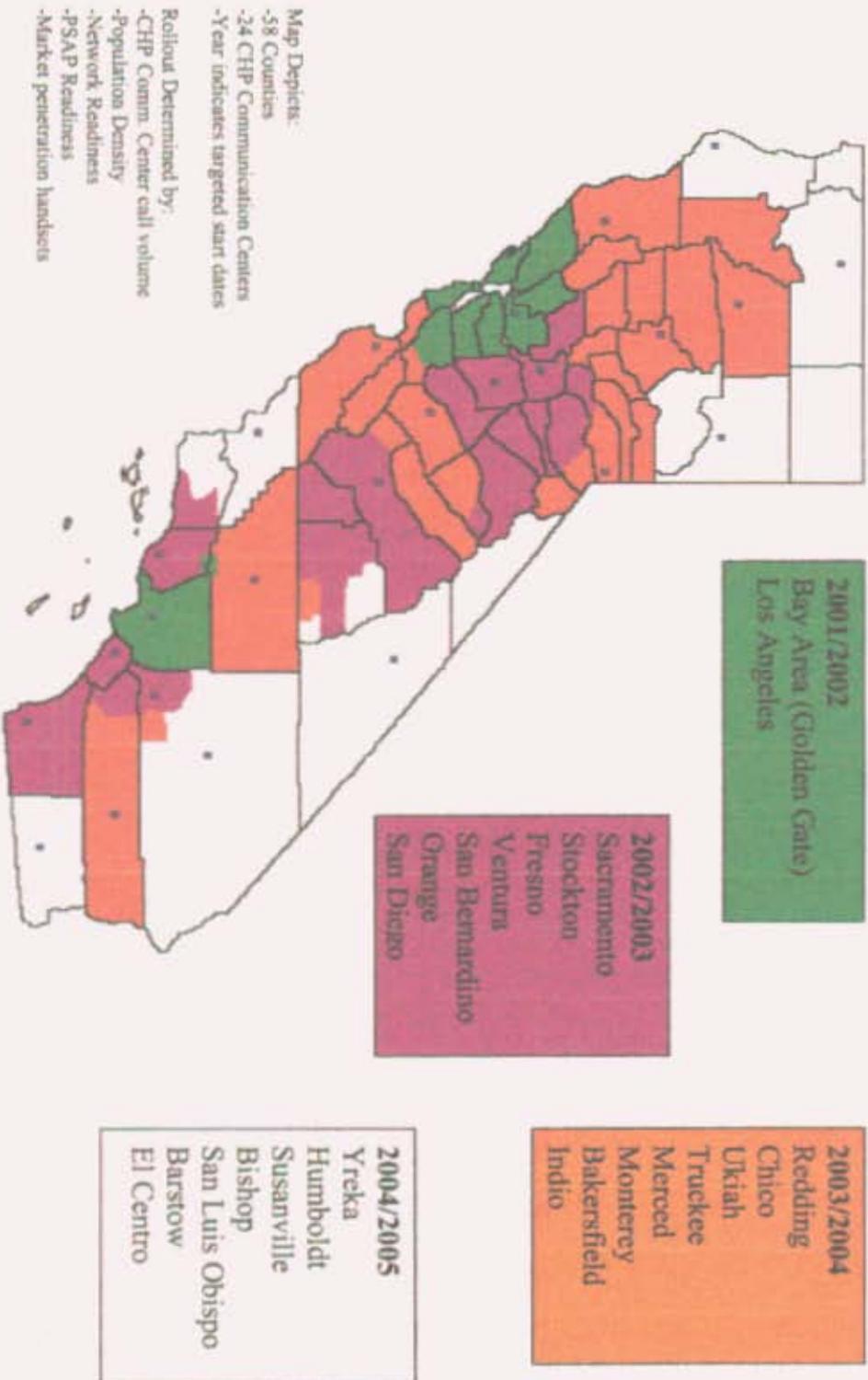
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⁶Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Fourth Memorandum Opinion and Order*, 15 FCC Rcd 17442, 17457 (2000) ("*E911 Fourth Memorandum Opinion and Order*").

State of California Wireless E-9-1-1 Plan



- Map Depicts:
- 38 Counties
 - 24 CHP Communication Centers
 - Year indicates targeted start dates
- Rollout Determined by:
- CHP Comm. Center call volume
 - Population Density
 - Network Readiness
 - PSAP Readiness
 - Market penetration handsets

CERTIFICATE OF SERVICE

I, CAROL MINDZAK, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 26th day of March 2002, had copies of the foregoing “SUPPLEMENT TO REPORT ON IMPLEMENTATION OF WIRELESS E911 PHASE II AND SECOND AMENDMENT TO PETITION FOR WAIVER OF CAL-ONE CELLULAR, L.P.” sent via hand delivery to the following:

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