

KURTIS & ASSOCIATES, P.C.

SUITE 200
1000 POTOMAC STREET, N.W.
WASHINGTON, D.C. 20007

(202) 328-4500
TELECOPIER (202) 328-1231

April 8, 2002

Via Electronic Delivery

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

Re: Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911
Emergency Calling Systems, CC Docket No. 94-102

Missouri RSA No. 7 Limited Partnership Petition for Waiver of Section 20.18(c)
of the Commission's Rules and the Deadlines Established in the Fourth Report
and Order, FCC 00-436, DA 02-640

Dear Mr. Caton:

On behalf of Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular, I am submitting the enclosed materials in the above-referenced proceeding in response to the request of the Commission's staff. If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Lisa L. Leibow

Lisa L. Leibow
Counsel for Missouri RSA No. 7 Limited Partnership
d/b/a Mid-Missouri Cellular

Enclosures

cc: Mindy Littell
Janet Sievert
Blaise Scinto
Patrick Forster
Jerome Stanshine

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	
To Ensure Compatibility with Enhanced)	CC Docket No. 94-102
911 Emergency Calling Systems)	
)	
Missouri RSA No. 7 Limited Partnership)	FCC 00-436
Petition for Waiver of Section 20.18(c) of the)	
Commission's Rules and the Deadlines)	DA 02-640
Established in the Fourth Report and Order)	

Information Sheet

SIZE OF COMPANY

Coverage Area

Under Call Signs KNKN595 and KNKR207, Missouri RSA No. 7 Limited Partnership d/b/a Mid-Missouri Cellular ("MMC") provides analog and TDMA-based cellular service in Missouri RSA 7, Market No. 510B, which comprises Lafayette, Saline, Howard, Cooper, Pettis, and Johnson counties in Missouri, including small portions of Ray, Carroll, Cass, Henry and Morgan Counties which were previously unserved areas claimed as part of RSA 7's CGSA, and previously unserved territory located in MSA Market No. 24B(2), which comprises a large portion of Ray County and a small portion Cass County in Missouri. This geographic area covers a landmass of approximately 4,750 square miles, and a population of 195,000. The largest town in MMC's territory is Sedalia, with a population of approximately 20,000.

Annual Revenues and Number of Subscribers

In order to provide the Commission with the revenue and subscriber information it desires while still protecting this competitively-sensitive market data, MMC directs Commission staff to subscriber counts and revenue data already on file with the Commission for MMC via FCC Form 499, Telecommunications Reporting Worksheet (*see* MMC's FCC Forms 499A, filed Apr. 1, 2002); and subscriber count data submitted in connection with both the FCC Form 502, Number Utilization Report (*see* MMC's FCC Form 502, filed Jan. 28, 2002) and the FCC Regulatory Fee Remittance Advice Form (*see* MMC FCC Form 159, filed Sept. 19, 2001), which is based upon the number of activated handsets.

Percentage Breakdown Between Digital and Analog-Only Subscribers.

As of February 2002, 47.2% of MMC's subscribers are digital, and 52.8% of MMC's subscribers are analog. All digital handsets are capable of operating in the analog mode.

Number of TTY Users on the Company's System

MMC is aware of *no* TTY subscribers on its system. In fact, MMC is aware of only one hearing-impaired subscriber, and that subscriber utilizes MMC's short messaging service instead of TTY service over MMC's analog service.

TECHNOLOGY SWAP-OUT (i.e. migration to CDMA or GSM) INFORMATION AND PATH TO TTY-DIGITAL COMPATIBILITY COMPLIANCE

MMC is currently evaluating which digital technology it will ultimately migrate its networks to. MMC is surrounded by carriers deploying differing digital technologies and is in the situation where virtually every major wireless carrier has a license for its own spectrum in at least a portion of MMC's market. MMC believes that it will be able to finalize a decision with respect to what technology it will migrate to within the next 9 months. Once the migration has been completed, any new digital network will be compatible with TTY devices. Therefore, any subscribers wishing to be capable of accessing 911 via a TTY device will be placed on the new digital network. MMC intends to retain its TDMA network, with the understanding that over time, MMC's TDMA network usage will probably drop off. However, it is impossible at this time to predict a timeline for that occurrence. MMC intends to let customer traffic demand (home and roamer) be the guide for determining when and if it will discontinue its TDMA service. However, this continued maintenance of the TDMA network will have no effect whatsoever on subscribers' digital access to 911 via TTY devices, as those subscribers will be placed on the new network.

PORTIONS OF SERVICE AREA WHERE COMPANY IS THE SOLE WIRELESS PROVIDER

MMC is not aware of any area where it is the only service provider. In fact, with six major competitors in its market there is little chance of any area where MMC is the sole wireless provider.

LEASING OR SHARING NETWORK EQUIPMENT vs. UTILIZING OWN FACILITIES

MMC primarily owns and operates all of its wireless infrastructure network equipment, with the exception of a portion of Cass County where service is provided under contract with equipment owned by Cingular Wireless. In addition, a portion of MMC's backhaul facilities is leased from local exchange carriers (large and small) and cable operators.

ESTIMATED NUMBER OF DIGITAL ROAMERS

On an average day, MMC estimates that its network currently handles approximately 2,600 roamers, with the majority of those being analog. The high percentage of roaming is analog because several of MMC's roaming partners use CDMA digital technology. The TDMA digital roaming is expected to drop off dramatically as Cingular Wireless continues the build-out of its competing network in MMC's market and its migration to GSM/GPRS. Further, TDMA is expected to be lost with the implementation of the recently-announced joint traffic agreements between Cingular Wireless and AT&T Wireless. Finally, TDMA roaming traffic is further expected to reduce as US Cellular makes its publicized migration from its current TDMA network in Columbia, MO to CDMA.

INSTITUTIONS FOR THE HEARING IMPAIRED IN OR NEAR SERVICE TERRITORY

MMC is unaware of any institutions for the hearing impaired in its licensed service areas.

.