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April 8, 2002

**Via Electronic Delivery**

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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

Illinois Valley Cellular RSA 2-1 Partnership, Illinois Valley Cellular RSA 2-II  
Partnership, Illinois Valley Cellular RSA 2-III Partnership, Joint 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 Illinois Valley Cellular RSA 2-1 Partnership d/b/a Illinois Valley Cellular,  
Illinois Valley Cellular RSA 2-II Partnership d/b/a Illinois Valley Cellular, and Illinois Valley  
Cellular RSA 2-III Partnership d/b/a Illinois Valley 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  
Illinois Valley Cellular RSA 2-1 Partnership  
d/b/a Illinois Valley Cellular  
Illinois Valley Cellular RSA 2-II Partnership  
d/b/a Illinois Valley Cellular  
Illinois Valley Cellular RSA 2-III Partnership  
d/b/a Illinois Valley 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                  | ) |                      |
|  | ) |                      |
| Illinois Valley Cellular RSA 2-1 Partnership   | ) |                      |
| Illinois Valley Cellular RSA 2-II Partnership  | ) | FCC 00-436           |
| Illinois Valley Cellular RSA 2-III Partnership | ) |                      |
| Joint Petition For Waiver of Section 20.18(c)  | ) | DA 02-640            |
| of the Commission's Rules and the Deadlines    | ) |                      |
| Established in the Fourth report and Order     | ) |                      |

**Information Sheet**

**SIZE OF COMPANY**

**Coverage Area**

Illinois Valley Cellular RSA 2-1 Partnership d/b/a Illinois Valley Cellular ("IVC 2-I"), Illinois Valley Cellular RSA 2-II Partnership d/b/a Illinois Valley Cellular ("IVC 2-II"), and Illinois Valley Cellular RSA 2-III Partnership d/b/a Illinois Valley Cellular ("IVC 2-III") (collectively, "IVC Partnerships") provide analog and TDMA-based cellular service in the Illinois 2 Bureau RSA, Market No. 395-B: IVC 2-I provides these services in Market No. 395-B1, which comprises portions of Bureau, Stark, Putnam, and La Salle Counties, under Call Sign KNKN583; IVC 2-II provides these services in Market No. 395-B2, which comprises portions of Bureau, Stark, Putnam, La Salle, and Livingston Counties, and all of Marshall County, under Call Sign KNKN582; and IVC 2-III provides these services in Market No. 395-B3, which comprises part of Livingston County and all of Ford and Iroquois Counties, as well as portions of Kankakee and McLean Counties, which were previously unserved areas claimed as part of its CGSA, under call sign KNKN581.

**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, we direct Commission staff to subscriber counts and revenue data already on file with the Commission for each of the IVC Partnerships via FCC Form 499, Telecommunications Reporting Worksheet (*see* IVC Partnerships' FCC

Forms 499A, filed Apr. 1, 2002); and subscriber count data submitted in connection with both the FCC Form 502, Number Utilization Report (*see* IVC Partnerships' FCC Forms 502, filed Jan. 29, 2002) and the FCC Regulatory Fee Remittance Advice Form (*see* IVC FCC Forms 159, filed Sept. 19, 2001), which is based upon the number of activated handsets.

### **Percentage Breakdown Between Digital and Analog-Only Subscribers**

Currently, roughly 60% of the IVC Partnerships' total subscriber base is digital. All digital subscriber handsets are capable of operation in the analog mode as well.

### **Ratio of Analog-Only to Digital Subscribers on Network**

Presently digital subscribers outnumber analog subscribers 3:2.

### **Number of TTY Users on the Company's System**

IVC Partnerships are aware of *no* TTY subscribers on their systems.

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

IVC Partnerships are currently evaluating alternative technologies for their migration to a new digital network. They have tentatively concluded to overlay a CDMA network but plan to finalize their decision by fourth quarter of 2002. Full roll-out of the CDMA overlay at all IVC cell sites is expected to be completed in three years. IVC Partnerships intend to continue operation of their existing TDMA network infrastructure. This intention may change, of course, depending on market factors, such as home customer demand for data, roaming customer demand for data, roaming agreements, continued vendor support and other factors. IVC Partnerships' overlay CDMA network will be TTY/911 compliant. Therefore, this continued maintenance of the TDMA network will have no effect whatsoever on new subscribers' 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**

IVC Partnerships are not aware of any area where they are the only service provider.

### **LEASING OR SHARING NETWORK EQUIPMENT vs. UTILIZING OWN FACILITIES**

IVC Partnerships own and operate all of their cell site wireless infrastructure network equipment, but lease their switching equipment.

### **ESTIMATED NUMBER OF DIGITAL ROAMERS**

On an average day, IVC Partnerships estimate that their networks currently handle approximately 450 TDMA roamers.

**INSTITUTIONS FOR THE HEARING IMPAIRED IN OR NEAR SERVICE TERRITORY**

IVC Partnerships are unaware of any institutions for the hearing impaired in their licensed areas.