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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

Public Service Cellular, Inc. 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 Public Service Cellular, Inc., I am submitting the enclosed materials in the
above-referenced proceeding in response to a 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 Public Service Cellular, Inc.

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)	
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)	
Revision of the Commission's Rules)	
To Ensure Compatibility with Enhanced)	CC Docket No. 94-102
911 Emergency Calling Systems)	
)	
Public Service Cellular, Inc.)	
Petition For Waiver of Section 20.18(c))	FCC 00-436
of the Commission's Rules and)	
the Deadlines Established in the)	DA 02-640
Fourth Report and Order,)	

Information Sheet

SIZE OF COMPANY

Coverage Area

Public Service Cellular, Inc. ("PSC") provides analog and TDMA-based CMRS wireless service in the Columbus, GA/AL MSA; Georgia RSA 6; Alabama RSA 5; Alabama RSA 8; Georgia RSA 5; Georgia RSA 9; and in the Anderson, SC, Anniston, AL, and Columbus, GA BTAs. PSC holds the licenses for cellular Stations KNKA415 (CMA153B), KNKN872 (CMA376B1), KNKN913 (CMA376B2), KNKN883 (CMA376B3), KNKN687 (CMA311B2), KNKN932 (CMA314B2), KNKN934 (CMA375B2), and KNKN976 (CMA379B1). In addition, PSC holds licenses for personal communications service ("PCS") Stations KNLG210 (BTA016F), KNLH422 (BTA017D), and KNLH421 (BTA092F). Collectively, PSC's wireless service areas comprise 47 counties in Georgia, Alabama and South Carolina, which for the most part are rural and sparsely populated.

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 via FCC Form 499, Telecommunications Reporting Worksheet (*see* Public Service Cellular, Inc., FCC Form 499A, filed Mar. 29, 2002); and subscriber count data submitted in connection with both the FCC

Form 502, Number Utilization Report (*see* PSC FCC Form 502, filed Mar. 20, 2002) and the FCC Regulatory Fee Remittance Advice Form (*see* PSC FCC Form 159, filed Sept. 19, 2001), which is based upon the number of activated handsets.

Percentage Breakdown Between Digital and Analog-Only Subscribers

Currently, 37% of PSC's total subscriber base is digital (IS-136 TDMA). All digital handsets are capable of operating in the analog mode.

Ratio of Analog-Only to Digital Subscribers on Network

Presently analog subscribers outnumber digital subscribers 2.7:1.

Number of TTY Users on the Company's System

PSC is aware of *no* TTY subscribers on its system.

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

PSC's primary roaming partners include AT&T Wireless and Cingular Wireless, which are both TDMA carriers who have selected a GSM, GPRS, EDGE 3G migration path, and Alltel, who has chosen a CDMA 3G migration path. In light of this dichotomy, PSC is currently in discussions with its neighbors and is evaluating options with respect to the migration of its networks to alternate digital technologies. PSC believes that it will be able to finalize its migration decision within the next six months. Once the migration has been completed, any alternative digital network will be compatible with TTY devices. Therefore, any subscribers seeking digital TTY access will be placed on the new digital network. PSC intends to retain its TDMA network, with the understanding that over time, PSC's TDMA network usage will probably drop off. However, it is impossible at this time to predict a timeline for that occurrence. PSC 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' access to 911 via TTY devices, as those subscribers will be placed on the new digital network.

PORTIONS OF SERVICE AREA WHERE COMPANY IS THE SOLE WIRELESS PROVIDER

PSC is not aware of any area where it is the only service provider.

LEASING OR SHARING NETWORK EQUIPMENT vs. UTILIZING OWN FACILITIES

PSC owns and operates all of its Lucent Technologies wireless infrastructure network equipment. Much of its network interconnection is via PSC's own microwave network, with the balance using leased LEC/IXC facilities.

ESTIMATED NUMBER OF DIGITAL ROAMERS

The average number of roamers per day for March 2002 was 17,398. Of these calls, 69.73 percent were digital roamers and 30.27 percent were analog roamers. The percentage of roaming attributable to analog is due to the fact that several of PSC's roaming partners, including Alltel, one of PSC's largest roaming partners, use CDMA digital technology. The TDMA digital roaming is expected to drop off dramatically as Cingular Wireless and AT&T Wireless continue the build-out of their competing networks in PSC's market and their respective migrations to GSM/GPRS. Further, TDMA roaming traffic is expected to be lost with the implementation of the recently-announced joint traffic agreements between Cingular Wireless and AT&T Wireless.

INSTITUTIONS FOR THE HEARING IMPAIRED IN OR NEAR SERVICE TERRITORY

While PSC is unaware of any institutions for the hearing impaired in its territory, PSC is aware of the following institutions:

Alabama Institute for Deaf and Blind, Talladega, AL
Atlanta Speech School, Clarkston, GA
Georgia School for the Deaf, Cave Springs, GA
South Carolina School for the Deaf and the Blind, Spartanburg, SC

None of these institutions are located within PSC's licensed service areas.