

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Revision of the Commission's Rules ) CC Docket No. 94-102  
to Ensure Compatibility with Enhanced )  
E911 Emergency Calling Systems )  
 )

To: The Commission

**Quarterly Report of Advantage Cellular Systems, Inc.  
Regarding TTY Access to Digital Wireless Systems**

Advantage Cellular Systems, Inc. ("Advantage") hereby reports on its implementation of text telephone ("TTY") access to digital wireless systems, in compliance with the Federal Communications Commission's ("FCC" or "Commission") Fourth Report and Order in the above-captioned proceeding.<sup>1</sup>

Since Advantage filed its last report on December 21, 2001, Nortel has scheduled Advantage's MTX10 upgrade for April 24, 2002. Nortel has yet to provide a schedule for the MTX10-related TTY upgrade. While Nortel has informed Advantage that verification office testing has been completed for its MTX10 software load, Advantage has been unable to field test Nortel's digital TTY solution. Advantage uses TDMA technology for its cellular network and has so far been unable to acquire a TDMA-based TTY handset with which to test its solution. As the Commission is aware, Cingular and AT&T have announced their respective plans to migrate their TDMA networks to different, incompatible air interfaces. These decisions reflect a general industry trend away from TDMA technology. It is unclear to Advantage, based upon conversations

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<sup>1</sup> *In re Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Fourth Report and Order, CC Docket No. 94-102 (released December 14, 2000).

with other similarly situated carriers in the industry, whether any digital TTY TDMA-handsets are generally available for testing purposes.

Based upon Nortel's representation regarding its TTY-compatible MTX10 software load, Advantage believes it will be capable of transmitting digital TTY calls by the Commission's June 30, 2002 deadline. However, given that Advantage cannot currently field test the Nortel digital TTY solution, it cannot verify this capability. To the extent that Advantage's inability to field test its digital TTY solution necessitates a waiver, Advantage hereby requests a waiver of the Commission's digital TTY rule.

Date: April 15, 2002