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ORIGINAL

April 15, 2002

William F. Caton
Acting Secretary of the Commission
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

Re: *Cellular Phone of Kentucky, Inc.*
Quarterly TTY Status Report -- CC Docket No. 94-102

Dear Mr. Caton:

Cellular Phone of Kentucky, Inc. ("CPK") hereby submits its TTY Quarterly Status Report.

Please do not hesitate to contact the undersigned with any questions that you may have at (202) 783-4141.

Very truly yours,

WILKINSON BARKER KNAUER, LLP

By: 
William J. Sill

Attachment

cc: Kris Monteith, Chief, Policy Division
Wireless Telecommunications Bureau
Pam Gregory, Director, Disabilities Rights Office
Consumer & Governmental Affairs Bureau

Cellular Phone of Kentucky, Inc.
Quarterly TTY Report
April 15th, 2002
CC Docket No. 94-102

In response to the Federal Communications Commission's ("FCC"), Fourth Report and Order,¹ in its Enhanced 911 proceeding in which it established new deadlines for digital wireless carriers to be capable of transmitting 911 calls made using TTY devices, Cellular Phone of Kentucky, Inc. ("CPK"), the licensee in the Kentucky 6 – Madison RSA (Block B1), hereby submits its TTY Quarterly Status Report ("Report").

CPK continues to work diligently with its vendors, to ensure timely TTY access to E911 for all its customers. The absence of firm commitments and definite standards from both infrastructure and handset vendors continues to be a major obstacle in meeting the June 30, 2002 deadline for obtaining all software upgrades and equipment necessary to make CPK's system capable of transmitting TTY 911 calls. CPK remains unable to order customer premise equipment ("CPE") capable of supporting TTY. There are currently no TTY capable handsets available to CPK and CPK cannot gain a firm date by which TTY capable handsets will be available in its market. Despite CPK's best efforts, failure to obtain the necessary TTY compatible hardware and software has proven to be insurmountable task.

Even after general availability of CPE, CPK will need time to deploy and test the solution across their network. CPK projects that it will take an additional 3-6 months from the receipt of the CPE to test and implement any TTY capabilities. CPK will continue to press their vendor for the necessary software upgrades and equipment necessary to meet the June 30, 2002 deadline. CPK is committed to take all necessary actions so that it is prepared to transmit TTY 911 service to its customers by June 30, 2002, however, meeting this deadline seems unlikely at this time due to circumstances beyond CPK's control.

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Fourth Report and Order*, 15 FCC Rcd. 25216 (2000) [hereafter "*Order*"].