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June 27, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
ATTN: CALEA 107(c)
445 12th Street, S.W.
Washington, DC 20554

*Re: Inland Cellular Telephone Company on behalf of
Washington RSA No. 8 Limited Partnership
Filer 499 ID No.801741
Eastern Sub-RSA Limited Partnership
Filer 499 ID No.801744
Further Report on Enhanced 911 Phase II Implementation*

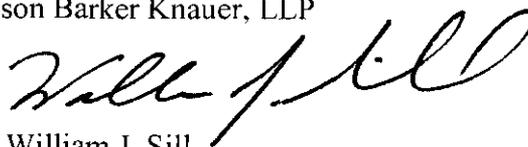
Dear Ms. Dortch:

Pursuant to section 20.18(i) of the Commission's rules, 47 C.F.R. § 20.18(i), Inland Cellular Telephone Company, the managing partner of Washington RSA No. 8 Limited Partnership ("WA8LP") and Eastern Sub-RSA Limited Partnership ("ESRLP") (collectively "Inland"), hereby provide the Commission with an updated status report of WA8LP's and ESRLP's plans for implementing Phase II enhanced 911 ("E911") service.

Please contact the undersigned counsel with any questions you may have at 202-783-4141.

Sincerely,

Wilkinson Barker Knauer, LLP



By: William J. Sill
Georgina L.O. Feigen

Enclosure

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

In the Matter of)
)
Revision of the Commission's Rules to Ensure)CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)
Calling Systems)
) Filer 499 ID No: 801741
Phase II Implementation Report) Filer 499 ID No: 801744

To: The Commission

FURTHER REPORT ON ENHANCED 911 PHASE II IMPLEMENTATION

Pursuant to Section 20.18(i) of the FCC's rules, 47 C.F.R. § 20.18(i), Inland Cellular Telephone Company, the managing general partner of block B licensees Washington RSA No. 8 Limited Partnership ("WA8LP") and Eastern Sub-RSA Limited Partnership ("ESRLP") (collectively "Inland"), by its attorneys, hereby provides the Commission with an updated status report of its plans for implementing Phase II enhanced 911 ("E911") service.¹ This updated report is organized in accordance with the guidelines provided by the Wireless Telecommunications Bureau.²

I. BACKGROUND/CONTACT INFORMATION

A. Background

Inland is a small CMRS carrier providing service to rural areas within the states of Washington and Idaho. Inland strongly supports the FCC's E911 Phase II initiatives and has

¹ Inland Cellular Telephone Company is the general partner of WA8LP and ESRLP. WA8LP is the licensee of Station KNKN489 on the Block B portion of the Washington 8 – Whitman RSA, Station KNKQ400 on the Block B2 portion of the Idaho 1 – Boundary RSA, and Station KNKR305 on the Block B2 portion of the Idaho 2 – Idaho RSA. ESRLP is the licensee of Station KNKQ283 operating on the Block B2 portion of the Washington 5 – Kittitas RSA.

² Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification, CC Docket No. 94-102, Public Notice, DA 00-2099 (rel. Sept. 14, 2000).

worked diligently with vendors of both network and handset equipment to gather the information necessary to develop a plan by which Phase II service and automatic location information (“ALI”) capable handsets will be provided.

On November 9, 2000, pursuant to section 20.18(i) of the Commission’s rules, Inland timely filed its Report on E911 Phase II Implementation (“ESRLP and WA8LP Reports on E911 Phase II Implementation”) to notify the Commission of its intention to use handset-based ALI technology. However, due to the lack of Phase II software, hardware and handsets, even when measured on a generally available (“GA”) basis, on July 30 2001 Inland filed a Petition for Limited Waiver (“Waiver Petition”) of the Phase II E911 obligations set forth in sections 20.18(e) and (g) of the Commission rules 47 C.F.R. §§ 20.18(e), 20.18(g). The Waiver Petition sought to sensitize the Commission to the unique difficulties and obstacles faced by a small rural cellular carrier such as Inland in its attempts to meet the Phase II E911 deadlines. In the Waiver Petition, Inland proposed to begin selling and activating location-capable handsets six to nine months following the GA dates provided by vendors, and stated that it would provide the Commission with progress reports regarding Inland’s ability to deploy E911 Phase II ALI handset technology.³ The Waiver Petition is currently pending at the FCC.⁴ The purpose of this instant report is to provide the Commission with updated information regarding Inland’s Phase II E911 plans.

B. Contact Information

Correspondence or other inquiries regarding this report should be addressed to:

Gregory A. Maras, Secretary

³ Waiver Petition at pp. 3, 8.

⁴ On October 12, 2001, the Commission released a Public Notice providing carriers until November 30, 2001 to file waiver petitions, and stating that it would not initiate enforcement action for small and mid-sized wireless carriers under Phase II E911 rules during the period in which the Commission is evaluating such carrier’s waiver petitions. *Commission Establishes Schedule for E911 Phase II Requests by Small and Mid-Sized Wireless Carriers*, Public Notice, FCC 01-302 (rel. Oct. 12, 2001).

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II. E911 PHASE II LOCATION TECHNOLOGY INFORMATION

A. Type of Technology

Based upon current technology and vendor representations received in response to multiple requests for information, Inland continues to pursue its plans to implement handset-based ALI technology across its network territory. Inland will be utilizing Nortel Networks (“Nortel”) as its vendor for obtaining an E911 Phase II ALI capable switch.

As Nortel did not make the MTX-10 software GA until the 2nd Quarter of 2002, this was the earliest date that any carrier could make its switch Phase II E911 punch-list compliant. Although Inland has purchased the necessary MTX-10 hardware (SR70EM), it must still be installed and re-certified by Nortel, as Inland purchased its switch on the secondary market. While still without a definitive installation date, based upon discussions with its vendor, Inland is confident that it will install the Nortel MTX-10 hardware by early in the 4th Quarter of 2002. Once the MTX-10 hardware is in place, Inland will upload the necessary MTX-10 software, making it Phase II E911 compliant.

As a small carrier, Inland has been precluded from direct participation in discussions with handset manufacturers and must ask vendors for information regarding when ALI capable handsets will be made GA. These vendors have shared with Inland that other small carriers are facing similar difficulties as Inland in obtaining the quantity of ALI capable handsets necessary to meet the Commission’s Phase II E911 benchmarks. Currently, Inland has been able to obtain

only one ALI capable handset model from Audiovox Corp. (“Audiovox”), the Audiovox 9155GPX. Inland has sold an Audiovox 9155GPX to a subscriber and thus, Inland has met its scheduled 3rd Quarter of 2002 projection for beginning the sale and activation of ALI handsets.

Unfortunately, Inland’s sales of the Audiovox phone have been hampered by a lack of customer enthusiasm for the phone. Inland’s subscribers strongly favor the features of its two best selling handsets, the Motorola V120C and Kyocera 2135. Further depressing customer demand is the fact that Audiovox’s non-ALI line of cellular telephones is significantly more expensive than Inland’s best selling cellular telephones, and that the Audiovox 9155GPX costs Inland \$50.00 more than its non-ALI counterpart. The Audiovox phone with Phase II E911 capabilities sells for 4-6 times the price of Inland’s best selling cellular telephones. Candidly, it will be difficult to sell any significant number of ALI handsets today as it is unlikely that a subscriber buying an ALI capable handset today would have Phase II E911 service prior to the time that the subscriber, would, on average, buy a new handset.⁵

A few other Phase II E911 ALI capable handsets exist, but they are either incompatible with Inland’s systems or unavailable to Inland. For example, Inland has been told by its vendors that Samsung has an ALI capable handset available—the Samsung SPH-N300—but that the phone is currently only compatible with Sprint’s system. Similarly, Verizon carries the Samsung SCHN300, which is ALI capable, but not available to carriers other than Verizon.

Inland has further learned that Motorola and Kyocera will have Phase II E911 capable handsets available in the 4th Quarter of 2002, and Nokia will have a Phase II E911 capable handset available in the 2nd Quarter of 2003.⁶ However, it is Inland’s belief that these projected

⁵ On average, Inland’s subscribers replace their cellular telephones approximately every year and a half. Based on our correspondence and conversations with the PSAPs within Inland’s service areas, it does not appear likely that E911 Phase II service will be rolled out in that timeframe. *See* Section II.C *infra*.

⁶ Nokia is the only manufacturer to have provided Inland with a representative. However, Inland must still purchase Nokia handsets through a vendor.

dates represent when the phones will first be released. Inland expects that Motorola, Kyocera and Nokia will make their ALI capable phones GA three to four months after they are first released, and that carriers such as Inland will only be able to purchase the handsets six to nine months after the GA date. Because Inland has not received any pricing information for the Motorola, Kyocera or Nokia models, Inland believes these models are still in the testing stages.

With access to only one ALI capable handset that is unpopular with its customers, the higher price for ALI capable handsets, and the perception that the ALI capability may not be used during the useful life of the handset, Inland believes that it will be a daunting, and perhaps, unattainable goal to meet the remainder of its originally projected penetration benchmarks.

B. Testing and Verification

Once Inland's switch has been integrated into its network and Inland has determined which ALI capable handsets will be used, Inland will make final its testing and verification plans.

C. Implementation Details and Schedule

Inland is able to report that it has already met its first deadline, the 3rd Quarter of 2002, to begin selling and activating its ALI capable handsets. However, for the reason outlined above, Inland believes that it will need to push back its ongoing benchmark projections.⁷

Although we are uncertain as to the extent to which Inland's stated benchmarks will need to be extended, the following more closely represents what we believe to be Inland's scheduled dates for meeting its deployment benchmarks:

- 3rd Quarter 2002:** Sale and Activation of ALI Handsets [**DEADLINE MET**]
- 2nd Quarter 2003:** 25% of all new Handsets are Location Capable
- 4th Quarter 2003:** 50% of all new Handsets are Location Capable
- 2nd Quarter 2004:** 100% of all new Handsets are Location Capable
- 2nd Quarter 2006:** 95% of ALI Handset penetration rate of all

⁷ Inland is currently considering whether it will need to file an amendment to its pending Waiver Request requesting the dates that Inland projects it will be able to meet for each of the Commission's stated benchmarks.

subscribers

It must be noted that Inland's implementation schedule remains dependent upon several external factors, which may impact its ability to meet the stated deadlines. For example, factors which Inland has no control over, such as the availability dates of E911 Phase II compliant equipment, will ultimately determine when Inland can meet the Commission's benchmarks. Inland is in the process of concretizing the degree of the extension that it believes it will be necessary to request from the Commission. Once Inland has made this final determination, it will make the appropriate filing.

D. PSAP Interface

To date, Inland has not received a PSAP request to provide Phase II E911. Indeed, Inland has been informed by several PSAPs that they do not have the funding to implement Phase II E911. As noted in the ESRLP and WA8LP Reports on E911 Phase II Implementation, Inland has sent letters to all of the local PSAPs within Inland's network requesting information on the status of the PSAP's implementation of Phase II E911.⁸ In its Report, Inland provided the Commission with the three responses from PSAPs explaining that neither plans nor funding had been allocated to implement Phase II E911.⁹ Since then, no new information has been provided from any of the PSAPs in Inland's service area regarding updates to Phase II E911 implementation plans.

Over the course of the past year, Inland has taken a leading role in forging a Phase I E911 Agreement with the State of Washington that will be utilized by the PSAPs in each county within Inland's service areas. Inland invested hundreds of man hours into this project because of its importance to Inland's subscribers. This Agreement, which has been accepted by State officials, paves the way for an expeditious roll out of Phase I service, which is the foundation of Phase II

⁸ See ESRLP and WA8LP Reports on E911 Phase II Implementation, p.3, Attachment II.

⁹ *Id.*

service. It is Inland's hope that when the PSAPs are able to support Phase II E911 service that a similar partnering between the State, counties, and Inland will occur.

E. Existing Handsets

Inland has no immediate plans to implement a handset retrofit program to replace existing customer owned non-ALI handsets with ALI compatible handsets. Rather, Inland's customers will be able to purchase new ALI compliant handsets for use with their existing active accounts as they become available. However, to the extent that handset retrofitting becomes economical and available to smaller markets such as Inland's, Inland will consider it as an option.

F. Location of Non-Compatible Handsets

Inland has no plans to implement a technology solution for non-compatible handsets. Inland will continue to review any vendor's plan for providing ALI information compatibility for ALI non-compatible handsets. Based upon responses from PSAPs and handset vendors to date, Inland believes that by the time the land line networks and the designated PSAP's facilities have been upgraded, the number of non-compliant handsets will be significantly reduced by the introduction of compatible handsets into the marketplace.

III. CONCLUSION

As discussed herein, the instant report is submitted pursuant Section 20.18(i), 47 C.F.R. § 20.18(i), of the Commission's rules. Inland will provide the Commission with updated reports as new information becomes available.

Respectfully submitted,

By:



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Managing Partner of Washington RSA No. 8
Limited Partnership and Eastern Sub-RSA
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June 27, 2002