

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST
2120 L STREET, NW
WASHINGTON, DC 20037

HAROLD MORDKOFKY
BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
KATHLEEN A. KAERCHER
DOUGLAS W. EVERETTE

(202) 659-0830
FACSIMILE: (202) 828-5568

June 28, 2002

ARTHUR BLOOSTON
1914 - 1999

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON
OF COUNSEL

PERRY W. WOOFER
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ
DIRECTOR OF ENGINEERING
PRIVATE RADIO

WRITER'S CONTACT INFORMATION

202-828-5540
jap@bloostonlaw.com

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

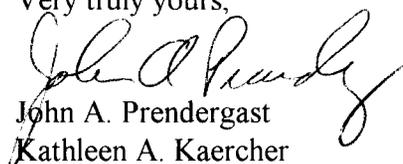
Re: Amended Petition for Waiver of the Phase II E911 Obligations Set Forth in
Section 20.18 of the Commission's Rules - CC Docket 94-102

Dear Ms. Dortch:

On behalf of Emery Telecommunications & Video, Inc. ("Emery"), we hereby submit its amendment to its pending Petition for Waiver of the Commission's Enhanced Phase II Automatic Location Identification Rules.

Please refer any questions or correspondence regarding this matter to this office.

Very truly yours,



John A. Prendergast
Kathleen A. Kaercher
Attorneys for Emery Telecommunications
& Video, Inc.

EMERY TELECOMMUNICATIONS & VIDEO, INC.

455 East Highway 29
P.O. Box 629
Orangeville, Utah 84537-0629

June 28, 2002

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Attn: Patrick Forster, Policy Division, Wireless Telecommunications Bureau

Re: Amended Petition for Waiver of the Phase II E911 Obligations Set Forth in
Section 20.18 of the Commission's Rules - CC Docket 94-102

Dear Ms. Dortch:

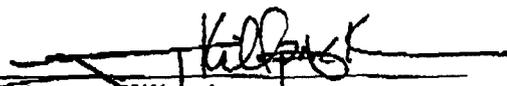
Emery Telecommunications & Video, Inc. ("Emery"), hereby amends its pending Petition for Waiver of the Commissions Enhance 911 Phase U Automatic Location Identification ("ALI") rules to request a fifteen-month deferral of each of the penetration benchmarks.

Emery launched its service in November 2001. Subsequent to its launch, Emery has entered into an agreement to assign the license for station WPOK951 to San Isabel Telecom, Inc. That application, FCC File No. 0000782012, was accepted for filing February 27, 2002 and is still pending. Emery is coordinating its Section 20.18 compliance efforts with San Isabel, and in this regard hereby joins in the request for extension of time being filed concurrently by San Isabel.

Emery understands that San Isabel's handset manufacturer, Kyocera, will not have ALI-capable handsets available to purchase in quantities over one hundred until later this summer or early fall. Accordingly, Emery hereby amends its pending Petition for Waiver to request a fifteen-month deferral of each of the penetration benchmarks. Grant of the requested waiver would be in the public interest, as it would allow time for Kyocera to fully develop the solution and test the phones before they are sold to consumers.

Respectfully submitted,
Emery Telecommunications & Video, Inc.

By: _____


Gregory Killpack
General Manager