

**Before the
Federal Communications Commission
Washington, DC**

In the Matter of:)
)
Revision of the Commission's Rules) CC Docket No. 94-102
To Ensure Compatibility With)
Enhanced 911 Emergency Calling Systems)

To: Wireless Telecommunications Bureau

**PETITION FOR TEMPORARY WAIVER AND
EXTENSION OF TIME**

Litchfield County Cellular, Inc. ("Litchfield"), pursuant to Section 1.3 of the Commission's Rules, requests a limited waiver of Section 20.18(c) of the Commission's rules to meet the June 30, 2002 deadline for digital wireless systems to be capable of transmitting calls from text telephone ("TTY") devices.

Litchfield, a small rural cellular carrier providing cellular service in the Kentucky 11 RSA, continues to work diligently to ensure timely TTY access to E911 for all its customers. The absence of firm commitments has continued to be a major obstacle for small carriers such as Litchfield to obtain the software upgrades and equipment necessary to make Litchfield's system capable of transmitting TTY 911 calls. Litchfield believes its switch is capable of supporting TTY with the installation of minor software upgrades. However, Litchfield remains unable to order customer premise equipment ("CPE") capable of supporting TTY.

Even after general availability of CPE, Litchfield will need time to deploy and test the solution. Litchfield projects that it will take an additional 3-6 months from the receipt

