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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

JUN 28 2002

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Waiver of the Rules of the Federal)	CC Docket No. 94-102
Communications Commission Relating)	
to the Transmission of Digital Wireless)	Rural Cellular Corporation and Subsidiaries
911 Calls from TTY Devices)	

To: Chief, Wireless Telecommunications Bureau

SUPPLEMENT TO
PETITION FOR WAIVER AND EXTENSION OF
DIGITAL WIRELESS 911 TTY REQUIREMENTS

Rural Cellular Corporation and its subsidiaries (collectively, the "RCC Licensees" or "Petitioner"), by their attorneys, hereby supplement the petition filed by Petitioner on June 20, 2002 for a temporary waiver and extension of time to comply with Section 20.18(c) of the Commission's rules, 47 U.S.C. Section 20.18(c), and the accompanying note to that section of the rules. The following additional information is provided in support of Petitioner's requests:

As indicated in the petition, the RCC Licensees operate in 12 states using switches manufactured by three different equipment suppliers. Attached to this "Supplement" is a list that reflects the proposed date for digital 911 TTY compatibility in each market served by the RCC Licensees, organized according to the switches utilized by such entities.

Petitioner has been in communication with its three switch vendors for extended periods of time to obtain assistance in determining what software upgrades, and corresponding pricing, are

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required to obtain capability to transmit digital 911 calls from TTY devices, and to implement the necessary software upgrades to achieve TTY/TDD functionality:

Nortel: In August 2001, Petitioner and Nortel negotiated an option for upgrade of Petitioner's Nortel switches from "MTX 8" to "MTX 10" software that would provide TTY/TDD functionality. It was expected that an intermediate upgrade to "MTX 9" could be skipped in the process. The purchase option was exercised by Petitioner in November 2001, and the upgrade process was scheduled to be completed at each Nortel switch within six months, by May 2002. As the planning proceeded, it was learned that the intermediate software upgrade to MTX 9 could not be skipped. Additional coordination between the vendor's and Petitioner's personnel became necessary and it was impractical to schedule the upgrades until July 26, 2002. If the installation is successful without complications, the Nortel switches will be TTY/TDD functional by the end of July 2002. However, to allow time to resolve unanticipated problems, a three-month extension of the deadline until September 30, 2002 is requested.

Ericsson: An Ericsson CMS-8800 Mobile Switching Center (MSC) located in Walla Walla, Washington serves as the switching center for the entire northwest operating region in Oregon and Washington. The MSC is currently on Ericsson Software Version 4. In order to evolve to a more current software load, Ericsson architecture mandated that the Home Location Register (HLR) portion of the MSC be moved to an off-board Stand-Alone HLR (SHLR). Accordingly, Petitioner put in place a plan to migrate the customer database to a pair of existing Lucent SHLR's. At the conclusion of this migration, it would become possible to load the appropriate software needed to support the TTY/TDD functionality. Several months into the project, it was discovered that there

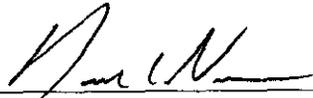
was a communication issue between the Lucent SHLR pair and the Ericsson MSC, wherein the Message Waiting Indicator feature would not activate when a customer received a voice message. This feature is an important part of the digital wireless offering Petitioner provides its customers. After exhaustive efforts by Petitioner, Lucent and Ericsson, it was determined that without significant additional development the feature would not operate correctly. At that time the decision was made to abandon the plan to migrate customers to the Lucent SHLR pair, and to immediately initiate a plan to purchase, install and put into service an Ericsson SHLR. This plan is well under way, with installation and initial testing scheduled to begin in early July. This test plan and a software upgrade to "Version 7" on September 30, 2002 will allow Petitioner to project that TTY/TDD capability will be in place by no later than December 31, 2002 as requested in the petition.

Lucent: Petitioner and Lucent have been in communication since mid-2001 over upgrades to achieve TTY/TTD functionality. Responses from Lucent to date have not been determinative as to whether it is possible to "patch" software "Load 16" which is now installed in Petitioner's Lucent Autoplex switches, or if a more costly "Load 17.1" is required. In either case, Petitioner's Lucent switches will not be capable of supporting a digital 911 call from a TTY device by June 30, 2002. In a worst case, it appears that "Load 17.1" will be required, at a cost to Petitioner in the high six figures that Petitioner is unable to budget before the first quarter of 2003. Preferably, Lucent will make available in the meantime a software patch to allow the current Load 16 to support digital 911 calls from TTY devices. To allow time for either contingency, a nine-month extension of time, until March 31, 2003, is requested.

For the reasons stated in the petition, as supplemented herein, RCC Licensees respectfully request grant of a temporary waiver and extensions as indicated by the petition.¹

Respectfully submitted,

**RURAL CELLULAR CORPORATION
and SUBSIDIARIES**

By:  _____
David L. Nace
Pamela L. Gist
Its Attorneys

Date: June 28, 2002

Lukas, Nace, Gutierrez & Sachs, Chartered
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Washington, D.C. 20036

Telephone: 202-857-3500

¹ Attached is a photocopy of a Declaration of Elizabeth L. Kohler in support of the facts contained in this Supplement. Counsel for Petitioner will submit the signed, original Declaration upon its receipt in Washington, D.C.

Proposed Compliance Dates According to Licensee Name and Market Served

<u>Switch Manufacturer</u>	<u>Requested Compliance Date</u>	<u>Licensee Name</u>	<u>Cellular/PCS Market Served</u>
Nortel	9/30/02	RCC Minnesota, Inc.	CMA 482 B1 – MN 1 – Kittson CMA 483 B1 – MN 2 – Lake of the Woods CMA 484 B1 – MN 3 – Koochiching CMA 486 B1 – MN 5 – Wilkin CMA 487 B1 – MN 6 – Hubbard CMA 224 B1 – Bangor, ME CMA 463 B1 – ME 1 - Oxford CMA 464 B1 – ME 2 – Sommerset CMA 465 B1 – ME 3 – Kennebec CMA 637 B1 – SD 4 - Marshall
		New Hampshire Wireless, LLC	BTA 274 F – Manchester-Nashua-Concord, NH
		TLA Spectrum, L.L.C.	BTA 391 C – St. Cloud, MN
		Saco River Communications Corporation	BTA 357 F – Portland-Brunswick, ME
Ericsson	12/31/02	RCC Minnesota, Inc.	CMA 608 A1 – OR 3 – Umatilla CMA 609 A1 – OR 4 – Lincoln CMA 611 A1 – OR 6 – Crook CMA 694 A1 – WA 2 – Okanogan CMA 695 A1 – WA 3 – Ferry CMA 700 A1 – WA 8 – Whitman
Lucent	3/31/03	RCC Atlantic, Inc.	CMA 248 A1 – Burlington, VT CMA 679 A1 – VT 1 – Franklin CMA 680 A1 – VT 2 – Addison CMA 470 A1 – MA 1 – Franklin CMA 548 A1 – NH 1 – Coos CMA 560 A1 – NY 2 – Franklin

<u>Switch Manufacturer</u>	<u>Requested Compliance Date</u>	<u>Licensee Name</u>	<u>Cellular\PCS Market Served</u>
Lucent	3/31/03	RCC Minnesota, Inc.	CMA 428 A1 – KS 1 – Cheyenne CMA 429 A1 – KS 2 – Norton CMA 433 A1 – KS 6 – Wallace CMA 434 A1 – KS 7 – Trego CMA 438 A1 – KS 11 – Hamilton CMA 439 A1 – KS 12 – Hodgeman CMA 440 A1 – KS 13 – Edwards
		RCC Holdings, Inc.	CMA 309 A1 – AL 3 – Lamar CMA 310 A1 – AL 4 – Bibb CMA 311 A1 – AL 5 – Cleburne CMA 313 A1 – AL 7 – Butler CMA 493 A1 – MS 1 – Tunica CMA 495 A1 – MS 3 – Bolivar CMA 496 A1 – MS 4 - Yalobusha
		SRCL Holding Co., Inc.	CMA 156 B1 – Portsmouth-Dover-Rochester, NH-ME

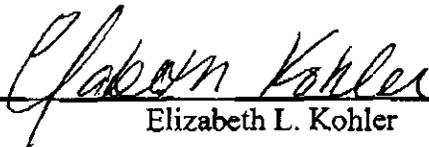
DECLARATION

I, Elizabeth L. Kohler, hereby state and declare:

1. I am Legal Services Director of Rural Cellular Corporation.
2. I am familiar with the facts contained in the foregoing "Supplement to Petition For Waiver And Extension of Digital Wireless 911 TTY Requirements" and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 27th day of June, 2002.


Elizabeth L. Kohler

CERTIFICATE OF SERVICE

I, Loren Costantino, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chtd., do hereby certify that I have on this 28th day of June, 2002, sent by hand-delivery, a copy of the foregoing SUPPLEMENT TO PETITION FOR WAIVER AND EXTENSION OF DIGITAL WIRELESS 911 TTY REQUIREMENTS to the following:

Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, D.C. 20554

Mindy Littell
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A161
Washington, D.C. 20554

A handwritten signature in black ink, appearing to read "Loren Costantino", written over a horizontal line.

Loren Costantino