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June 28, 2002

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attn: Patrick Forster, Policy Division, Wireless Telecommunications Bureau

Re: San Isabel Telecom, Inc.
Amended Petition for Waiver of the Phase II E911 Obligations Set Forth
in Section 20.18 of the Commission's Rules - CC Docket No. 94-102

Dear Ms. Dortch:

On October 1, 2001, San Isabel Telecom, Inc. ("San Isabel") submitted a Petition for Waiver of the Phase II enhanced 911 obligations set forth in Section 20.18 of the Commission's Rules (CC Docket No. 94-102). The waiver requested a nine-month deferral of each of the penetration benchmarks in Section 20.18(1)(i)-(iv) based upon representations made by handset manufacturers.¹ San Isabel's handset manufacture, Kyocera, has informed the company that it will not have ALI-capable handsets available to purchase in quantities over one hundred until later this summer or early fall. Accordingly, San Isabel hereby amends its pending Petition for Waiver to request a fifteen-month deferral of each of the penetration benchmarks. Grant of the amended waiver would be in the public interest, as it would allow time for its handset manufacture to fully develop the solution and test the phones before they are sold to San Isabel subscribers.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

John Kuykendall
Its Attorney

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¹ See San Isabel's Petition for Waiver at 5 citing manufacturers' representations contained in Alltel Communications Petition for Waiver of Sections 20.18(e) and (g) of the Commission's Rules filed July 25, 2001 at 17.

DECLARATION OF BRIAN WAGNER

I, Brian Wagner, Vice President of Operations of San Isabel Telecom, Inc., do hereby declare under penalty of perjury that I have read the foregoing Amended Petition for Waiver and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.


Brian Wagner

Dated: June 28, 2002