

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Revision of the Commission’s Rules ) CC Docket No. 94-102  
to Ensure Compatibility with Enhanced )  
E911 Emergency Calling Systems )  
 )

To: The Commission

**Quarterly Report of Farmers Mutual Telephone Company  
Regarding TTY Access to Digital Wireless Systems**

Farmers Mutual Telephone Company (“Farmers”) hereby reports on its implementation of text telephone (“TTY”) access to digital wireless systems, in compliance with the Federal Communications Commission’s (“FCC” or “Commission”) *Waiver Grant Order* in the above-captioned proceeding.<sup>1</sup>

In its last report, filed April 15, 2002, Farmers noted that Nortel, its infrastructure provider, indicated that it had to modify Farmers’ switch in order to be able to load MTX10 and achieve digital TTY compatibility.<sup>2</sup> In that report, Farmers noted that Nortel was scheduled to implement the switch modification and software upgrade load by late 3<sup>rd</sup> quarter 2002.

On May 24, 2002, Farmers filed for a limited waiver of the June 30, 2002 deadline for operators of digital wireless systems to be capable of transmitting 911 calls

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<sup>1</sup> *In re Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Order, CC Docket No. 94-102, DA 02-1540 (June 28, 2002) (“*Waiver Grant Order*”).

<sup>2</sup> Farmers’ switch is a DMS100W wireline/wireless hybrid. Nortel no longer supports such wireline/wireless hybrid switches with software upgrades. Farmers must split the switch in two in order to upgrade to MTX10.

from individuals with speech or hearing disabilities through the use of text telephone (“TTY”) devices.<sup>3</sup> In its waiver petition, Farmers stated that Nortel had informed Farmers that the earliest that it expected to be able to deliver the necessary software upgrade for digital TTY compatibility to Farmers was September 2002. This September date coincides with Nortel’s expected date by which it will finish the necessary switch modification.

Farmers has subsequently worked with Nortel regarding the switch modification and software upgrades and, at this point, Nortel is still on schedule. On July 10, 2002, Nortel finished the first step regarding intermediate software upgrades to make Farmers’ processor able to accept the MTX10 upgrade when it is delivered and the switch has been modified. Nortel estimates that Farmers’ switch modification and MTX10 software upgrade can still be finished before the end of the year. Assuming that Nortel can stay on this schedule, Farmers expects that Nortel can install the TTY upgrade software by late 3<sup>rd</sup> quarter 2002, and that Farmers can test the TTY solution and have it working by December 31, 2002.

July 11, 2002

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<sup>3</sup> 47 C.F.R. § 20.18(c).