

**Brookings Municipal Utilities
d/b/a Swiftel Communications
415 Fourth Street
Brookings, SD 57006**

July 11, 2002

Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

***Re: CC Docket No. 94-102 / Quarterly TTY Implementation Report
Broadband PCS Stations WPOI260 and WPQL803
MTA12 A2 – Minneapolis, St. Paul, MN
MTA32 B2 – Des Moines-Quad Cities, IA***

Dear Ms. Salas:

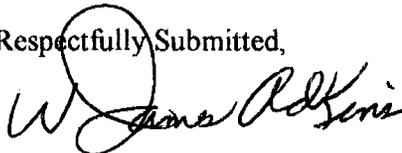
Brookings Municipal Utilities d/b/a Swiftel Communications (“Swiftel”) hereby submits its quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission’s *Fourth Report and Order* in CC Docket No. 94-102, *released* December 14, 2000.

Swiftel is using Nortel CDMA base stations and switching equipment in its network. Therefore, we are dependent on Nortel for the provision and installation of the equipment and software necessary to allow our digital wireless network to process 911 calls originating from TTY devices. In this regard, we have received conflicting reports from Nortel sales representatives about the availability of TTY upgrade software for our current DMS-100 Dual Load, Wireless on Wireline switch. In brief, Nortel has made a business decision to discontinue the DMS-100 Dual Load Wireless on Wireline product. The software version that we are currently running on our Dual Load switch (LWW007) includes wireless MTX09, but this is the last software upgrade that Nortel is making available for our switch. Nortel indicated in a regulatory FAQ/RFI sent to its customers in January of this year that TTY capability would be supported by MTX09 switch software, running NBSS 10.1.2 on the base stations. However, Nortel technical staff have recently represented to Brookings that NBSS 10.1.2 (and TTY capability) could not be supported by our Dual Load switch.

Because the necessary software for providing TTY capability on our CDMA network is not available, Swiftel filed with the Commission a request for limited waiver

of the TTY implementation deadline.¹ As indicated in its waiver request, Swiftel is seeking an extension of at least nine months (*i.e.*, until March 31, 2003) to implement its new wireless switch and to provide TTY capability on its network. Swiftel will try to provide TTY capability before this extended deadline, if at all possible.²

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "W. James Adkins". The signature is written in a cursive style with a large initial "W".

W. James Adkins
Technical and Network Operations Manager

Att.

¹ See Request for Limited Waiver of Swiftel Communications, CC Docket 94-102, filed June 27, 2002.

² The Wireless Bureau has recognized the special circumstances faced by small wireless carriers using Nortel's hybrid wireless/wireline switch and granted a one-year extension for SpectraCom, Inc. d/b/a PYXIS Communications to implement TTY capability throughout its wireless network. See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Calling Systems, *Order*, CC Docket 94-102 (*rel.* June 28, 2002).

Brookings Municipal Utilities d/b/a Swiftel Communications
E911 TTY Device Capability Report for July, 2002

I. DEVELOPMENT ACTIVITIES

- 1) **Network Infrastructure Software Development** – Swiftel is engaged in ongoing discussions with Nortel Networks (“Nortel”) about the availability and ongoing technical support for software upgrades that will allow TTY capability using our current DMS-100 Dual Load, Wireless on Wireline switch. Swiftel began developing technical specifications for a new wireless switch back in January of 2002. However, because Swiftel is a municipal entity, it must follow a competitive bidding process established by the State of South Dakota. In this regard, the Brookings Municipal Utility Board granted authorization for bidding back on February 25, 2002. The Utility Board awarded the MTX wireless switch contract on May 28, 2002, and Purchase Order No. 311393 was signed, approved and issued to Nortel on the same date. Nortel has agreed to provide the new switch within six months from the date of the purchase order. To this must be added the one- to three- months it is expected to take to split the traffic from the existing switch (a process that is highly unusual and will be a feat of technical complexity to perform seamlessly) and additional time to upgrade and troubleshoot the new system software. Therefore, it is clear that an extension of at least nine months (*i.e.*, until March 31, 2003) will be needed for Swiftel to implement its new wireless switch and to provide TTY capability on its network. Swiftel will endeavor to provide TTY capability before this extended deadline, if at all possible.
- 2) **Handset Development and Testing Plans** – We are closely following the CDMA handset development and interoperability testing that is being performed by Sprint PCS. We have learned from Sprint PCS and our handset vendor that the following CDMA handsets have been tested and are TTY capable:
 - PCS Phone by Samsung A400
 - PCS Phone by Sanyo 6200
 - PCS Phone by Kyocera 1135
 - PCS Phone by LG 1010
 - PCS Phone by LG 4NE1
 - PCS Phone by Audiovox 9155
- 3) **Beta Testing and Lab Testing** – Swiftel is a small rural carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, Swiftel will test the equipment it procures as soon as it is available, to make sure it meets the manufacturer’s specifications.
- 4) **Release and General Availability to Carriers of Network Infrastructure Software** – See answer to #1, above. We also direct the Commission’s attention to Nortel’s most recent TTY status report, which we understand will be included in the July 2002 report in CC Docket No. 94-102 by ATIS/TTY Forum.

- 5) **Availability to Carriers of Full Digital Acceptance Test Units** – See Item #2, above.
- 6) **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – Dependent on handset vendors for enhanced TTY devices.
- 7) **Carrier Coordination of Testing with PSAP** – Swiftel will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel. In addition, Swiftel will be following the ATIS-sponsored TTY Technical Standards Incubator (TTSI) program for further information regarding PSAP testing.
- 8) **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed.
- 9) **Retail Availability of Necessary Consumer Equipment** – Subject to availability from Sprint PCS and our handset vendor, Swiftel's CDMA customers will be able to purchase TTY capable handsets and equipment through our retail stores, or online from Sprint PCS. As noted in response to Item #2 above, at least six TTY-compliant handsets have been tested and approved for operation on CDMA networks.
- 10) **Geographic Scope of Network Infrastructure Deployment** – Since our network will have only one switch, as necessary software becomes available, it will be deployed across our whole network.