



July 5, 2002

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

Dear Ms. Dortch:

Montana Wireless, Inc. ("MWI") hereby submits its quarterly report on implementation of Text Telephone ("TTY") access to E911 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000.

MWI is committed to complying with Commission requirements regarding TTY. However in order to comply with this government mandate, MWI must upgrade its system. As the Commission is aware from MWI's previous filings in this docket, due to Nortel's discontinuation of its support of MWI's current dual-load wireless and wireline traffic switch, MWI must purchase a second switch and split the traffic from the existing switch. Before MWI can split the traffic, it must upgrade the system software to LWW007 (the equivalent of wireless MTX 9). Once the switch split is achieved, MWI must upgrade the system software a second time to wireless load MTX 10. Because of Nortel's decision to no longer support its dual mode switch, MWI has been put in the unusual circumstance of having to perform a technically complex switch split seamlessly.

Before MWI can proceed with the complex implementation task ahead of it, however, it must obtain the necessary software and hardware from its longtime vendor, Nortel. As MWI informed the Commission previously, it has had difficulty even obtaining a price quote from Nortel. Attached hereto is a copy of a letter dated June 10, 2002, from Nortel's Senior Sales Executive, Brian Meehan, to MWI parent company Blackfoot Telephone Cooperative's Dave Martin. This letter explains and apologizes for the delay in providing Blackfoot with a price quote for the required technology. The letter does not, however, provide that

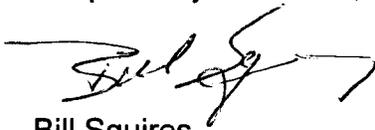
price quote, but assures that one will be forthcoming in the near future. To date, Nortel has not provided the promised price quote.

Not only must MWI upgrade its software in preparation for the installation of the second switch. MWI must also determine if it will require any modifications to its physical plant to accommodate the additional hardware such as additional power or cooling capability. Once the new switch is installed, MWI must install a second software upgrade that will permit it to split the traffic from the single switch, and accomplish that split. MWI understands that it will take about ten weeks to complete each software upgrade and approximately four months for the switch split. When the second upgrade is complete, MWI will be in a position to test and deploy the new technology.

MWI submits that it has no reasonable alternative than to wait for Nortel to provide it with a quote for the afore mentioned switch splitting and software upgrades. MWI's system is completely based on Nortel infrastructure; any alternative solution would require a complete replacement of MWI's entire system. Such an action would be financially prohibitive and economically wasteful. MWI chose the dual switch to serve its rural market because it was more economical than a two-switch system. As a rural operator, MWI's license area is comparatively sparsely populated; it does not receive a return on its infrastructure development investment as rapidly as non-rural operators. Therefore, when constructing its system MWI chose a dual load switch, the most economical alternative. At the time MWI purchased the switch, it did not envision that Nortel would discontinue its support of the technology a few short years later.

MWI remains committed to complying with Commission requirements regarding TTY.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bill Squires", with a horizontal line extending to the left and a vertical line extending downwards to the right.

Bill Squires  
Senior Vice President – General Counsel  
Montana Wireless, Inc.



June 10, 2002

Mr. Dave Martin  
Blackfoot Telephone Cooperative  
1221 North Russell St  
Missoula, MT 59808

Dear Mr. Martin

Nortel Networks regrets the time it is taking to resolve the issue that prevents Blackfoot Telephone from meeting regulatory requirements such as CALEA, E-911 Phase II and E-911 TTY. As you are aware, the DMS-100W which provides both wire line and wire less services was manufacture discontinued in 2001.

While we have been discussing the need to split the existing switch into two separate switches, Nortel Networks has been slow in providing Blackfoot Telephone with a price quote. We now feel that we are close to correcting this issue. Nortel Networks is making this price quote a priority and we will provide you with a DMS-100 solution as soon as possible. Once accepted by Blackfoot Telephone, you will be able to meet the regulatory requirements stated above upon installation of the new DMS.

We apologize for the lengthy delay in assisting Blackfoot Telephone and your quest to be compliant with regulatory features.

Sincerely

Brian Meehan  
Senior Sales Executive  
Nortel Networks

Montana Wireless, Inc.  
E911 TTY Device Capability Report as of June 27, 2002

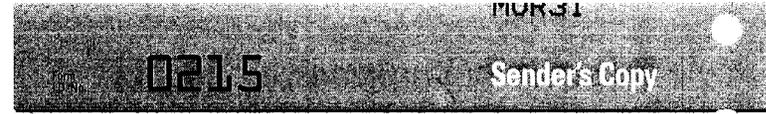
**Development Activities**

1. **Network Infrastructure Software Development** – We have continued discussions with our network vendor, Nortel. They indicate that TTY compatible software will be in the MTX 10 software load. This software load cannot be installed until the current switch is split and a new switch installed.
2. **Handset Development and Testing Plans** – We currently offer our customers two different models of Motorola handsets. Motorola has informed us that sometime in July 2002, it will release software that, when uploaded, will make Motorola handsets TTY capable. We are awaiting delivery of that software and will make it immediately available upon request. In addition, we will be evaluating two new Nokia handsets, model 6385 and 3585, which are due to be released in July/August and October, respectively. Both models are reportedly TTY compatible and we would expect to offer them for sale as well. However, the TTY feature will not become functional until our system upgrade is completed. To date, we have not had a single request for TTY capable equipment.
3. **Beta Testing and Lab Testing** – We are a small rural carrier, and are looking to our equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, we will test the equipment we procure 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** – Unable to determine a firm date at this time with any manufacturer or vendor.
5. **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
6. **Efforts Toward Achieving Digital Wireless Solution compatibility with enhanced TTY** – We must upgrade our switch, split the switch and load additional software. We have requested a quote from Nortel on a weekly basis since late 2001, but Nortel has not yet agreed to a schedule to provide the required equipment and software to upgrade our system.

**Testing and Deployment Activities**

7. **Carrier Coordination of Testing with PSAP** – We 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.

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** - We are unable to determine the retail availability of consumer equipment, as none of the handset manufacturers has been able to release a date for general availability. However, as indicated above, at least two major manufacturers have indicated that they are moving toward handset availability during the second half of 2002.
10. **Geographic Scope of Network Infrastructure Development** – Since our network has only one switch, as hardware becomes available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.



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*INWI Qtrly TTY Report 7.5.02 due 7.16.02*

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